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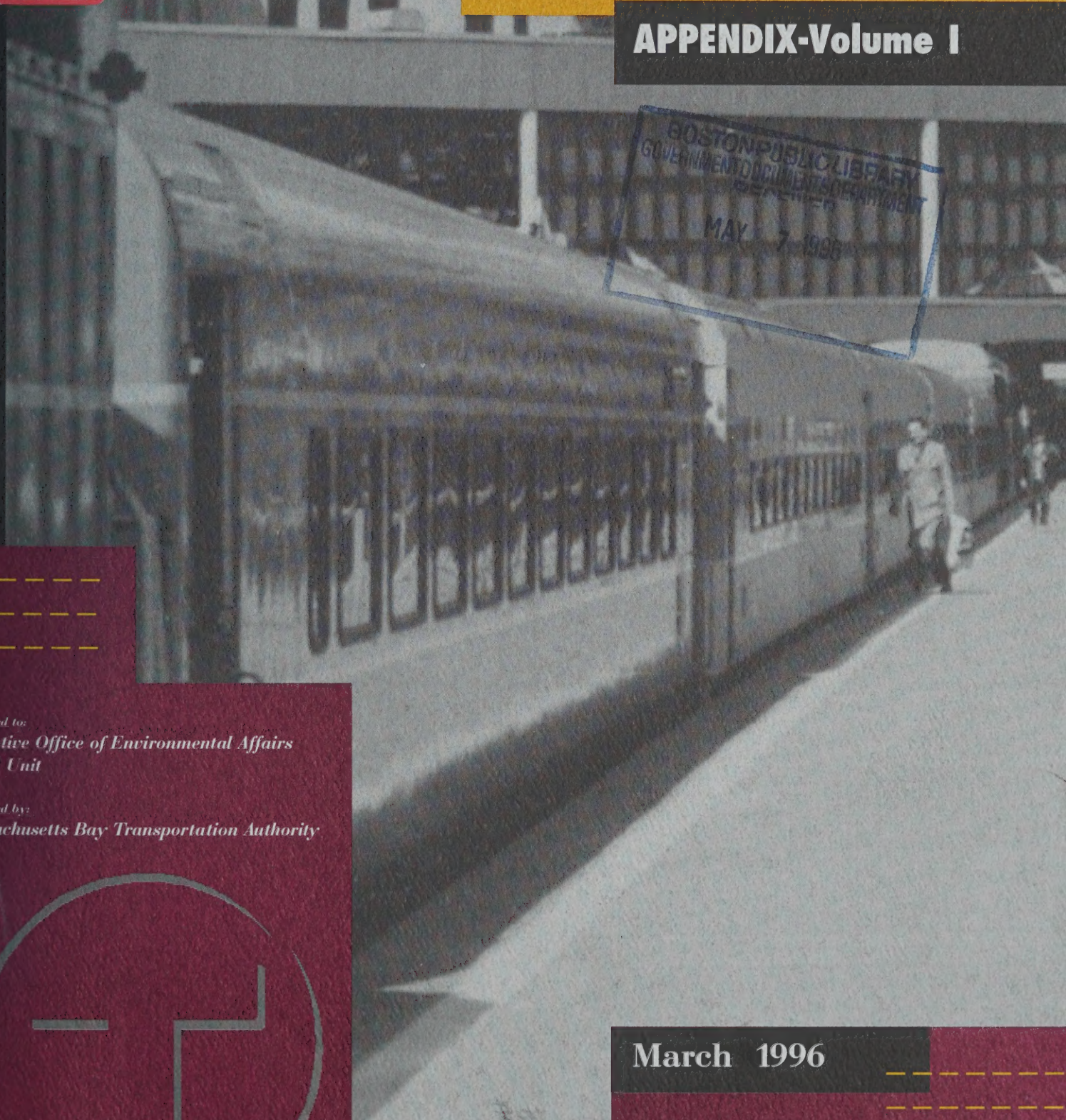
Worcester Commuter Rail Extension Project

EOEA No. 9154

FINAL Environmental Impact Report

Millbury Station, Grafton Station, Railroad Operations

APPENDIX-Volume I



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Submitted to:
Executive Office of Environmental Affairs
MEPA Unit

Submitted by:
Massachusetts Bay Transportation Authority

March 1996

Worcester Commuter Rail Extension Project

APPENDIX - VOLUME 1

FINAL ENVIRONMENTAL IMPACT REPORT

MILLBURY STATION - GRAFTON STATION - RAILROAD OPERATIONS

EOEA No. 9154

Commonwealth of Massachusetts

William F. Weld
Governor

Argeo Paul Cellucci
Lieutenant Governor

James J. Kerasiotes
Secretary and MBTA Chairman

Patrick J. Moynihan
MBTA General Manager

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APPENDIX - VOLUME I

- Introduction
- List of all Comment Letters on November 1994 DEIR
- MEPA Certificate and Comment Letters on November 1994 DEIR
- Response to Comments on November 1994 DEIR
- List of all Comment Letters on July 1995 FEIR
- MEPA Certificate and Comment Letters on July 1995 FEIR
- Response to Comments on July 1995 FEIR

APPENDIX - VOLUME I

Introduction

Appendix Volume I presents all comment letters received on the November 1994 DEIR and on the July 1995 FEIR - Railroad Right-of-Way and Layover Facility.

In a Notice of Project Change submitted to the Secretary of Environmental Affairs on October 31, 1995, permission was sought to prepare and file two further Final EIR's in lieu of on Final EIR for Stations and Railroad Operations. This request was prompted by the unresolved issues pertaining to the proposed Ashland, Southborough, and Westborough Stations, especially pertaining to their interaction around ridership and traffic and the need to address these stations simultaneously with reconsideration of a possible regional station. The Secretary issued a Certificate on January 10, 1996, which approved the above request. Thus, the July 1995 FEIR for Railroad Right-of-Way and Layover Facility is designated as FEIR #1; the current FEIR for Millbury Station - Grafton Station - Railroad Operations is designated as FEIR #2; and the future FEIR for Ashland, Southborough, and Westborough Station is designated as FEIR #3.

Comments on the November 1994 DEIR were received from 99 different sources, including the Certificate of the Secretary of Environmental Affairs. Comments on the July 1995 FEIR (Railroad Right-of-Way and Layover Facility) were received from 9 different sources, including the Certificate of the Secretary of Environmental Affairs. Following is a presentation of quoted individual comments received on the DEIR and on the FEIR. Each comment is responded to in a manner which answers fully the comment or refers to the appropriate section in the current FEIR which covers Millbury Station - Grafton Station - Railroad Operations.

Some of the DEIR comments were responded to in the July 1995 FEIR. Those comments are considered to have been responded to in a adequate manner and are noted as "Response presented in FEIR #1, Railroad Right-of-Way and Layover Facility, July 1995." Any reference notations refer to FEIR #1. The balance of the DEIR comments and the comments received on FEIR #1, as each of these bears on the Millbury and Grafton Stations and on Basic Service Railroad Operations, are responded to in the current FEIR #2. Some carry-over issues are also addressed. Those comments which relate to the

Ashland, Southborough, and Westborough Stations are noted as "Response will be in FEIR #3, Ashland, Southborough, and Westborough Stations." Again, some carry-over issues will be addressed also.

The individual comment within each comment letter (The Secretary's Certificate has been designated as Comment Letter No. 1) have been number, i.e. Comment No. 13 in Letter No. 2 is called Comment 2-13. All comment letters are listed in the first part of this Appendix, followed by the full text of each letter with the individual comments numbered in the margins.

MASSACHUSETTS BAY TRANSPORTATION AUTHORITY
Worcester Commuter Rail Extension Project
EOEA No. 9154

CERTIFICATE AND COMMENT LETTERS on November 1994 DRAFT ENVIRONMENTAL IMPACT REPORT

MEPA Correspondence

1.	EOEA DEIR Certificate	3-16-95
2.	Citizens Advisory Committee Comments on DEIR	11-9-94

State Officials and Agencies

3.	MA Senate/Senator Matthew J. Amorello	3-9-95
4.	MA Senate/Senator Robert A. Durand	3-6-95
5.	House of Representatives/Harriette L. Chandler	3-7-95
6.	Department of Food and Agriculture/Marcia Starkey	3-6-95
7.	MA Historical Commission/Brona Simon	3-9-95
8.	DEP Central Region/Mary J. Richards	3-9-95

Regional Agencies and Organizations

9.	Central MA Regional Planning/Carl Hellstrom	3-9-95
10.	MA Restaurant Association	2-5-95
11.	MA Audubon Society/E. Heidi Roddis	3-8-95
12.	Bicycle Coalition of MA/John Allen	1-22-95
13.	Metropolitan Area Planning Council/David Soule	2-28-95
14.	METROWEST/Charles E. Gaffney	3-7-95
15.	Assoc. for Public Transportation/Dennis Campbell	3-8-95
16.	MASCO/Robert Tassinari	2-16-95

City Officials, Agencies and Organizations

17.	MBTA Advisory Board Capital Planning Committee/Bernice Mader	3-8-95
18.	Preservation Worcester/Patrice O'Malley Hagan	2-27-95
19.	Worcester Office of Planning and Community Development/ Stephen F. O'Neil	2-24-95
20.	Union Station Alliance	3-9-95
21.	Andrew B. O'Donnell/Member Worcester Commuter Rail Task Force	3-9-95
22.	Worcester City Manager's Office/Thomas Hoover & David Forsberg	3-13-95
23.	Worcester Business Development Corporation/Thomas J. Andrews	3-9-95
24.	Millbury MBTA Advisory Committee/Brennan F. Wall	2-1-95
25.	Tufts University/Franklin M. Loew	2-24-95
26.	Grafton Board of Selectmen	3-6-95
27.	Southborough Board of Selectmen	3-7-95
28.	Westborough School Committee/Lydia DaSilva	3-1-95
29.	Westborough Planning Board/Richard Brady	2-21-95
30.	Westborough Board of Selectmen	3-6-95
31.	Westborough Police Department	2-27-95
32.	Westborough Historical Commission	1-10-95
33.	Westborough MBTA Advisory Committee	3-3-95
34.	People for the Ashland West Alternative/John Kelly	2-17-95
35.	Ashland Board of Selectmen	3-6-95
36.	Ashland MBTA Rail Committee	3-9-95
37.	Ashland Town Planner/Stephen Kerlin	3-9-95
38.	Ashland Office of Selectmen and Town Manager	11-22-94
39.	Framingham Planning Department	3-7-95
40.	Hopkinton Office of the Selectmen	3-8-95
41.	Hopkinton Appropriations Committee/John Woodward	3-8-95
42.	Newton Department of Planning and Development	3-2-95
43.	Wellesley Board of Selectmen	1-6-95
44.	Boston Redevelopment Authority	3-6-95
45.	Boston Environmental Department	3-8-95

Millbury - Citizen Comments

46.	Brennan F. Wall	2-17-95

Grafton - Citizen Comments

47.	Scott Rossiter	2-12-95

Westborough - Citizen Comments

48.	Larry Gomes	2-24-95
49.	Louis & Maureen Jankauskas	2-21-95
50.	Mary Fisher	2-24-95
51.	Mary Cullen	2-20-95
52.	Stephen & Charlene Henry	2-24-95
53.	Brian and Antoinette Kenned	3-7-95
54.	Mario Avelloni	3-3-95
55.	E. Thomas and Judith McCabe	3-6-95
56.	Sally Tajiani	3-5-95
57.	Janice and Alan Silvestry	3-5-95
58.	Rosemary Johnson	3-6-95
59.	Diane Power	3-7-95
60.	Dennis Cox	3-8-95
61.	Jacqueline and David Cox	3-8-95
62.	Robert Brais, Barbara Brais, Marie Brais	3-5-95
63.	Dorothea MacLeod	3-6-95
64.	Marvin Silver	3-7-95
65.	Barbara Reismann	3-7-95
66.	William and Mary Anne Coveney	3-6-95
67.	Jane and Richard Dunphy	3-4-95
68.	Joseph Orlando	2-20-95
69.	Elizabeth Colbert	2-22-95
70.	Joseph Harrington	2-14-95
71.	Mrs. Paul Smith	2-21-95
72.	Helen and Bill Panas	2-17-95
73.	William Murphy	2-8-95
74.	Jennifer Speed	3-7-95
75.	Bruce Johnson	3-6-95
76.	Cheryl and Paul Crivello	2-28-95
77.	Susan Stager	2-26-95
78.	Ellen Gugel	1-19-95
79.	Barbara Sullivan and Fran Lynch	1-29-95

Southborough - Citizen Comments

80.	Richard Fournier, Jr.	3-5-95
81.	James Knowles	2-23-95
82.	Peter Venuto	2-23-95
83.	Patricia Pirozzi	2-14-95
84.	James Waddell	2-14-95
85.	Russell Fustino	10-4-94
86.	Jane Fedorowicz and Michael Golibersuch	2-8-95

87. Anne Huff 1-8-95
88. Judith and Thomas Little 2-2-95

Ashland - Citizen Comments

89. Burnam's Supper House/Daniel Giargiari 3-3-95
90. Nelson Holden 3-6-95
91. Claudia Lefter for Nelson & Martha Holden 2-8-95
92. Citizens Lefter, Leacu, Camille, Holden 3-7-95
93. Ellen Giargiari 2-28-95

Hopkinton - Citizen Comments

94. John Woodward 1-6-95
95. Andrew and Teresa Boyce 2-2-95

Boston - Citizen Comments

96. Keith Davison 3-3-95

Unknown Communities - Citizen Comments

97. Dorothy McMahon 3-7-95
98. Jackie Adams 3-6-95
99. Julia McTigue Jacobs

Comment Letter No. 1

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street. Boston. 02202

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March 16, 1995

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Worcester Commuter Rail Extension Project
PROJECT LOCATION	: Statewide
EOEA NUMBER	: 9154
PROJECT PROPONENT	: Massachusetts Bay Transportation Authority
DATE NOTICED IN MONITOR	: December 7, 1994

The Secretary of Environmental Affairs herein issues a statement that the Draft Environmental Impact Report submitted on the above project adequately and properly complies with the Massachusetts Environmental Policy Act (G. L. c. 30, s. 61-62H) and with its implementing regulations (301 CMR 11.00).

Overview

The Draft Environmental Impact Report (DEIR) has evaluated the environmental impacts and issues relating to the proposed initiation of commuter rail service along an existing 23 mile rail corridor between the Framingham commuter rail line and the City of Worcester. The service will use the Conrail track which passes through Worcester, Millbury, Grafton, Westborough, Southborough, Ashland, and Framingham. A second track will be re-laid along 11 miles of existing roadbed from Westborough to Worcester. An interim service along this route was reinstated to Worcester in the fall of 1994, and was recently reported to be very successful in attracting ridership. Full service is scheduled to be operational by December 31, 1996, as required by the air quality regulations of the Department of Environmental Protection (DEP).

The DEIR was pre-reviewed by the Citizens Advisory Committee (CAC) and comments from the CAC were included in the DEIR. Generally, these comments appear to be comprehensive, accurate, and fair. They should receive full consideration in the FEIR. Citizens in the municipalities affected by the project have shown

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(2) a high level of interest in this project, as well; their comments are referenced in this Certificate and listed below. Sensitivity to these concerns should be demonstrated in revisions and refinements to the project design and siting, in the operational plans, and in the commitments to the environmental mitigation proposed in the FEIR.

Subsequent to this DEIR review, the MBTA will be considering the appropriateness of bringing forward certain elements of the project sooner than others. This could be handled in separate FEIR reviews. Information gathered during the DEIR review gives some preliminary indication of the advantages and disadvantages of such a plan. The City of Worcester, Office of Planning and Community Development comment, for example, has identified a need to complete the permanent layover facility as soon as possible because of the neighborhood complaints regarding noise and diesel fumes at the temporary layover site in the Providence and Worcester rail yard.

The Special Procedure established for this project would enable separate review of project components. However, this would need to be accomplished so as to avoid any inadvertent shift or increase in environmental impacts. As an example, the CAC comment raises the concern that there may be unexpected impacts associated with the advancement of individual stations out of phase with the others. The Committee recommended that the FEIR cover at least the Ashland, Southborough, and Westborough stations.

Another advantage of two separate and sequential FEIRs would be that the second FEIR could provide an additional opportunity to answer any outstanding issues raised during the review of the first FEIR. This would help to ensure that significant and controversial issues would be addressed to the greatest extent.[1] A proposal to prepare separate FEIRs should be filed as a Notice of Project Change with a recommendation for the topics to be considered in each document. This approach will provide additional opportunity for public comment.

The remainder of the Certificate will highlight important issues to complement and reinforce key concerns raised in the CAC comment and those listed at the close of the Certificate.

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[1] This could also give the Town of Ashland an opportunity to review and comment on station plans received late in the DEIR public review period.

Revenue Issues

Commenters have raised the issue of the MBTA's capability to finance this project while maintaining existing services and funding service expansions already approved, a concern driven by increases in project cost and reductions in the MBTA operating budget. Although a financial feasibility analysis reference in the DEIR (p. 3-48) concluded that the Old Colony project, major capital improvements including the Newburyport extension, and the reinstatement of the Worcester commuter line were within the overall financial capability of the MBTA, no supporting information was provided.

This is an important matter that warrants more discussion in the FEIR. As suggested in the comments, in a worst case situation the MBTA could be put in a position of having to make tough choices such as increasing fares, increasing assessments, reducing services, and deferring or eliminating mitigation in order to maintain and expand the transportation system. Should this occur, then the ridership gains of this project might be off-set by losses in ridership elsewhere in the system. The net effect could be increased vehicle miles of travel (VMT) and higher levels of air pollutants. The FEIR should provide sufficient information to demonstrate that the MBTA will be able to operate this project without adversely affecting its services elsewhere. (3)

Commenters have also expressed concern about financial assessments which are imposed on communities within, and not those outside, the district, even though citizens in non-member communities will use the service. While I appreciate such concerns, I find they are not within the scope of MEPA review. In general, MBTA's financial systems and decision-making are mnot subject to this review, except to the extent they have implications for the environmental impacts of proposed projects.

Alternatives

Alternative Transportation Modes

The analysis of alternative transportation service options is a comparative summary of the Worcester Extension project with the No Build and Express Bus Service options. The analysis concludes that bus service cannot attain the level of ridership achievable by commuter rail. However, bus service is less expensive; operation and maintenance costs have been estimated to

be $1.53 million ($1.96 per passenger), compared with $5.08 million ($4.33 per passenger) for the Worcester Extension Service. According to the DEIR, environmental impacts appear to be somewhat less extensive with busing due to the fact that station facilities would be limited to parking. However, the impacts of the alternatives have not been quantified for comparative purposes and the information provided in this section of the DEIR allows only limited understanding of this matter. (4)

The ridership projections for commuter rail and bus services were estimated based on census and other data for the cities and towns in the transportation system capture areas. Certain assumptions were also made about transportation networks and mode choice factors (p. 4-4) to arrive at the ridership estimates. (5) Were these same assumptions used in the ridership study in Section 5? (6) What mode choice factors were used for rail and bus services and how were those factors used in the analysis? (7) What is the degree of accuracy of the ridership projections, given that 1980 census data were used? The inclusion of this information with the DEIR ridership study in Appendix II, Section 2 would have been appropriate.

A comparative analysis of vehicle miles of travel (VMT) and air emissions between Build and No Build conditions was based on the 1994 ridership projections (Section 5.5).[2] This analysis was done to show the regional air quality benefit of the Worcester Extension project. It was estimated that regional VMT will be reduced by 118,000 in 1996. This corresponds to a net VOC reduction of 113 kilograms per day (kg/day), a reduction of NOx by 199 kg/day and a CO reduction of 1584 kg/day. Because speeds on the Mass Pike are expected to increase to some extent, emissions reductions have been estimated to be greater than the effects of the commuter rail extension project.

Section 4 of the DEIR concludes with a comment that the Worcester Extension project is required by the Department of Environmental Protection (DEP), air quality regulations (310 CMR 7.36 (2) (c)2), unless substitution of an alternative becomes necessary because the engineering, environmental impacts, or economic impacts cause the project to be infeasible. (8) Although it appears to be unintended, the limited text leads to the question the CAC has raised. Is this significant state transportation

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[2] The assumptions in this analysis have been discussed to a greater degree than the ridership projections used in the comparison between mode choices.

project justified primarily because it has been found to be "not infeasible?" A more thoughtful response (which may take note of recently published ridership data) is needed in the FEIR. (8)

Regional Station Alternative

The DEIR provides enough information about potential regional station site alternatives to demonstrate that regional station siting for the commuter rail extension will be significantly more complicated and difficult than intermediate station layout and design, due in large part to environmental impacts and costs. In addition, the DEIR indicates that neither the ridership demand for a regional station nor the negative effects of the intermediate station plan are so compelling that a regional station must be advanced immediately and in spite of the environmental impacts and costs associated with it.

Commenters from the Town of Westborough have expressed an interest in the substitution of a regional station because of the impacts predicted at the Westborough station site. Concerns have been raised in other communities as well that an intermediate station could become, de facto, a regional station. Finally, the CAC and others have advocated strongly that a feasibility study of an I-495 regional station be undertaken before decisions are made on the intermediate stations.

I find that the DEIR has been responsive to the scoping certificate on this issue. I also note that the MBTA will be conducting a report to the Legislature on this issue in the near future, as directed by the recently passed Transportation Bond Bill. I request that the MBTA carefully consider the concerns and arguments raised during this review. I also request that the report to the Legislature be made available for public comment (through a notice in the Environmental Monitor) and that the (next) FEIR report on the results. I leave it to the judgment of the MBTA, however, to decide whether those results warrant a change in the intermediate station analysis, to be presented in the FEIR. (9)

Ridership Projections

The DEIR has explained that four station build out scenarios were used as the basis for modelling ridership. However, the results, in Tables 5.3-1 and -2, and the discussion consider only two alternatives (Alternate 3 and 4), which shows the predicted range of ridership at the intermediate stations for 1996. It is (10)

(10) unclear why the results for Alternate 1 and 2 were not also presented here to understand the effects of unconstrained parking and the inclusion of a regional station on ridership. This information should be included in the FEIR.

(11) The interim service has been operating for several months and ridership has presumably stabilized. The FEIR should evaluate the accuracy of the ridership projections for Worcester based on actual ridership data. If possible, the conclusions drawn from this assessment should be extrapolated to the intermediate station ridership projections to verify that the programmatic design for those stations is sound.

(12) The impact that the interim service has had on other HOV modes, in particular bus service, should be assessed in the FEIR, as per the CAC comment.

Regional Traffic

The DEIR has predicted "at least modest reductions" in traffic volumes on Route 9 and the Massachusetts Turnpike, while access routes to the stations will experience increased traffic during peak hours of travel. The most significant traffic reduction in 1996 is expected on the Mass Pike between Route 128 and Boston (1400 fewer vehicles in the AM peak).

Layover Facilities

The layover facility will consist of new railroad tracks for four, 9-car train sets, internal access driveways, an electrical substation, a 30 foot by 50 foot maintenance building, fencing, lighting, fire hydrants and an employee parking lot. Nighttime storage and train end runs will occur in the layover facility. The site selection process considered certain criteria, primarily size and location near the last station on the line, in order to identify a preferred location. According to the DEIR, none of the 13 potential sites met all the criteria. The preferred alternative (site 8), at the Conrail Yard, MP 43.5 in Worcester, is in a predominantly industrial area.

The City of Worcester, Office of Planning and Community Development and Preservation Worcester prefer the proposed location because it accommodates four tracks, is adjacent to the Amtrak station, is within a mile of Union Station, the area is industrial, and the location provides parking and facilities for

personnel. As suggested by the City, it may also be possible to realign the site to provide a double-ended facility after permanent service is initiated from Union Station.

Because of expected noise, vibration, odor, and air quality impacts, layover facility siting avoids residential areas, wherever possible. However, there is an elderly housing complex, the Mt. Carmel Apartments, located on the north side of Shrewsbury Street, within 300 feet of the centerline of the layover facility. The DEIR predicted that these apartments may be exposed to an Ldn of 70 dBA under worst case conditions. However, no noise mitigation is planned, because the report indicates that mitigation is only necessary when noise impacts reach or exceed 74 dBA Ldn. This conclusion should be explained in terms of ambient noise levels, the applicable noise impact criteria used to draw this conclusion, and the location where the noise impact was measured. (13)

Reducing train idling time is an effective way to limit locomotive noise impacts. The MBTA has minimal ability, however, to control idling in cold weather. Consequently, this mitigation measure would be unreliable. Electric power sources provide an alternative way to control idling noise. However, the report provides no assurances that this alternative source of power will be used for this purpose. Additional discussion of this issue should be provided in the FEIR to better understand existing applications, the potential effectiveness in controlling auxiliary engine noise, and the degree of noise attenuation that could be achieved at sensitive receptors, such as the elderly housing complex. (14)

The results of the pure tone analysis indicate that the DEP guideline, i.e. the peak exceeds each adjacent octave band sound pressure level by more than 3 dB, will be exceeded for the older 1000-series locomotives. The MBTA is purchasing new locomotives, i.e. 1050 series, which will not have as great an impact, but the phase out of the older locomotives is unspecified. Therefore, the FEIR should consider the frequency of use of the noisier locomotives at initiation of service and long-term to more accurately forecast pure-tone exceedances. (15) The FEIR should consider the feasibility of operating only newer train sets. (16)

The site plan of the layover facility, Figure 9.0-1, also shows that the site is being used as an interim station with platforms, a passenger drop-off area, and a 177 parking space lot. The FEIR should explain what will happen to the station facilities after Union Station is developed. As requested by the (17)

(18) City of Worcester, Office of Planning and Community Development, the FEIR should include any plans for future remodelling of the layover facility after Union Station is complete. The FEIR
(19) should also specify the noise mitigation measures that will be undertaken during construction of the layover facility. Those described in the DEIR (p. 9-10) seem appropriate, but no commitments have been made.

Rail Line Impacts

As a result of the addition of a double track along a 7 mile segment from Westborough to Worcester, there will probably be additional drainage, wetlands, wildlife, and archaeological resource impacts. The rail embankment widening and fencing will cause impacts too. However, the DEIR indicates that the areas of new disturbances will not be identified until final design. This
(20) raises the concern that the public review may not disclose the extent of the project-related impacts to the natural environment because the FEIR is due at about the 60 percent design stage. To the extent possible, these impacts should be described fully in the FEIR and the report should demonstrate that an effort was made to avoid and minimize damage to resource areas. As noted previously, submission of a separate FEIR for issues relating to the rail line and layover facilities will be considered in a NPC after completion of the DEIR review.

(21) The same level of impact analysis should be provided for the inadequate bridges which will be reconfigured, (the Pine Street Bridge in Grafton, and the Route 85 bridge in Southborough). I
(22) note that the CAC and the MAPC have raised a variety of questions relating to bridge reconstruction and lowering of the rail line for double-stacked trains that should be addressed in the FEIR.
(23) There are also three grade crossings between Framingham and Worcester that will be affected by the additional train operations. Impacts associated with the increased rail service should be explained in the FEIR.

The implementation of the commuter service (20 trains per day) has been predicted to have a noise impact on 6 residences in Grafton, and the expanded service (32 trains per day or 12 additional trains) is expected to impact 92 residences along the corridor (Table 7.3-2), due to increased train speeds as well as an increase in the number of trains. The DEIR has recommended noise barriers, because of the potential effectiveness, and ballast mats to control vibration. At the same time, the DEIR indicates that two percent of the construction costs can be used

for mitigation. Will there be sufficient funding to mitigate the noise and vibration impacts to the desired levels? Have the barriers been found to be cost effective and therefore implementable? In areas that do not appear to meet the cost effective criterion, will noise attenuation measures be proposed for the buildings directly, or will other measures be proposed? (24)

Commenters have raised a concern that 31 trains will be running as late as 1:20 AM (p. 3-45). The FEIR report should be particularly sensitive to nighttime noise impacts and consider ways to control those late night and early morning operations. (25) The FEIR should also respond to concerns expressed by the City of Boston with noise impacts in the Framingham-Boston corridor, and concerns that the noise standards used do not take into account background noise and cumulative impacts. (26)

The DEIR includes an inventory of the expected train vibration impact (Table 7.3-4) to 41 residences. After reviewing the vibration mitigation options, the DEIR concludes that about 4650 feet of ballast mats would be needed to reduce the impact entirely. The report concludes that it may not be cost effective to protect only a few houses, however. Moreover, mats may not be as effective in areas where the vibration is due to low frequency components. The FEIR should clarify the vibration mitigation plan based on further assessment of the areas of impact. (27)

Archaeology and Historical Impacts

Although the main text is quite abbreviated, Appendix I in DEIR is sufficiently complete to understand the work undertaken to identify and remediate archaeological and historical impacts. The results of background research, an architectural windshield survey, an archaeological walkover survey, and predictive modelling to identify the archaeological sensitivity of the sites impacted by the project.

Areas of potential disturbance, with the exception of the bridge work, will not be known until final design, and so the extent of the potential impacts is unclear. The recommended station sites generally are considered potentially significant for archaeological resources; all interim station locations, including Millbury station sites (Route 122, and Route 20), Grafton, Westborough, Southborough, and Ashland are identified for further study.

28 The DEIR has also recommended a complete architectural survey; however, the recommendations for the work on historical bridge structures remain unclear. This should be addressed in the FEIR. I concur with the suggestions of the Massachusetts Historical Commission (MHC) as to how and when to proceed with surveys and more advanced investigations, and what information should beprovided in the FEIR.

29

Drainage

30 The FEIR should provide more detailed information about the required culvert repair work and any new drainage outlets which will result in wetlands impacts. Commitments to the maintenance of the storm drainage system should also be made in the FEIR. What specific measures are needed for the oil drip pans and separators, such as those described for the layover facility (p. 9-11)? Although the description of the systems appears to suggest that these may not be the typical oil separators, the degree of effectiveness has not been predicted.

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Station by Station Comments

33 The following discussion of station impacts is a summary of some of the salient points raised in the comments listed below. I note that comments like those submitted on behalf of the Town of Westborough cannot be easily summarized; as provided in the MEPA regulations, those comments nonetheless require a response in the FEIR. In addition, the Draft Section 61 Finding in the FEIR should itemize the proposed mitigation measures by station location.

34

Many favorable comments were received for the Southborough station proposal. The Westborough station site appears to be the most controversial, based on the number of issues raised. Many comments advocated for the development of a more regional station, in order to eliminate the localized impacts on some municipalities, particularly the impacts in the Towns of Westborough and Southborough.

35 The CAC and several commenters have concerns that traffic will be diverted and impacts worsened if adjacent stations are not developed within the same timeframe. This issue needs to be considered in the FEIR.

Agricultural impacts may result indirectly from growth that is induced by expanded commuter rail service. As requested in the comment from the Department of Food and Agriculture, mitigation off-sets for indirect farmland impacts should be considered in the FEIR. According to that agency, several commuter rail stations have the potential to provide marketing opportunities for local farmers. (36)

Bicycle and pedestrian accessibility to and from the proposed stations is an important issue; amenities such as sidewalks, bike paths, lockers, and good travel routes to the station need attention in the FEIR. (37)

Ashland - The CAC comment raises important issues concerning platform alignments and parking availability that need further evaluation. (38)

It appears that the south parking lot access at Route 135 will have a significant impact. The Town of Ashland has recommended widening for designated turn lanes and signalization for safety. This should be evaluated in the FEIR. There are also concerns with the intersections in Ashland that are at levels of service (LOS) D/F. Mitigation measures for these locations should also be considered. (39) (40)

The MetroWest comment supports the east alternative, chosen by Ashland Selectmen because it has the potential to improve the waste site cleanup area, opens areas for commercial and industrial development, has minimal wetland impact, and avoids a grade crossing for some commuters.

There is also comment in support of the Ashland west alternative which indicates that the traffic and noise impacts would be lower and that at grade crossings would be shorter in length. Furthermore, the west alternative avoids potential delays with the Nyanza waste site cleanup. This alternative has the potential for localized business impacts, according to the comment from Daniel Giargiari, which should be addressed in response to the concerns raised.

Millbury - The CAC comment questions some traffic assumptions and results that should be reconsidered in the FEIR. In addition, a drainage system maintenance plan and commitments to fulfill the requirements of the plan need to be clarified in the FEIR. (41) (42)

More traffic mitigation may be needed at Route 122/20, according to commenters, and land taking is a concern. The access road from Route 20 could be developed so as to encourage economic development.

(43) Bicycling and pedestrian access options should be pursued, and a commenter notes that the Route 122 station location is preferable because it is accessible to pedestrians and by bicycle.

(44) *Southborough* - Commenters indicate that the pedestrian overpass is aesthetically out of character with the neighborhood. As an alternative, reactivation of the existing underpass has been proposed. The compatibility of the station design in the rural business district needs to be shown in the FEIR.

Some have solicited a commitment that a garage will not be built at the proposed Southborough Station and the reservation of 90 spaces on north side for residents only is controversial.

(45) As expected, there are traffic concerns and impacts on the residential character of the area. Closure of the median on Route 9 at Woodland Road has been reported to be held up because of the EIR review for the commuter rail project. It is not clear why this is so. Furthermore, the CAC comment recommends that the

(46) proposed signal timing changes at Route 85/Southville Road be reviewed because this measure may not be sufficient to mitigate the traffic impacts.

Westborough - Historical properties have been overlooked according to the comment from the Westborough Historical Commission. Furthermore, archaeological survey data has not yet been provided to the Town or the Massachusetts Historical Commission.

(47) Neighbors have raised concerns about noise impacts on homes and the neighborhood that deserve attention in the FEIR.

There are also concerns with the safety of children who walk on Fisher Street during commuter rush hours. Sidewalks are in poor condition or non-existent; however, according to the CAC, plans for sidewalks are being developed.

(48) Traffic volumes on Milk to Maynard Streets should be higher than indicated in the DEIR, and volumes on Fisher Street appear to be too low also. The traffic assumptions have been questioned

by the CAC, the Town of Westborough municipal agencies and the MBTA Advisory Committee. Background growth does not appear to have been fully accounted for in the study and commuter route distribution has been questioned. (48)

The roadway improvements at the Route 9/Otis Street intersection may not make this the preferred route to the station. A route from Milk Street to Fisher Street, and then to Smith Valve would be more direct, based on comments. Safety issues at the key intersections have not been addressed to the satisfaction of commenters. Streets such as Arch Street are narrow and rural in character. However, these local streets have been impacted to a great degree by the development on Route 9 near Otis Street. These traffic and safety concerns warrant thoughtful consideration in the FEIR. (49)

Grafton - A commenter sees an economic development potential being created in Central Massachusetts by the Grafton Station siting. A reverse commuting pattern could be established because of the linkage opportunity for biotech parks along the rail corridor. The traffic analysis should reconsider station traffic to Green Street in Shrewsbury. (50)

Wellesley - The Town has raised a concern that no impact assessment of the 3 stations in Wellesley has been provided in the DEIR. The Town has specific safety concerns. (51)

Boston - A comment has observed that the DEIR did not provide a study of the potential for a new station at Kenmore Square (Yawkey Way) and its connection to the urban ring. (52) The City of Boston has pointed out that additional information is needed to address pedestrian and platform issues at South Station. (53)

Newton - The Department of Planning and Development has raised the concern that the basic and full build service may cause significant scheduling disruptions on existing services. This may be particularly so at the three stations in Newton because this is a single track service. (54)

March 16, 1995
DATE

Trudy Coxe
Trudy Coxe

Comment Letter No. 2

CAC - Citizens Advisory Committee
Comments on
Draft Environmental Impact Report (DEIR)
EOEA # 9154

General Policy Statements of the CAC

GP1 Sec 17.0

CAC wants to be on record, that the now documented interrelationship among station sites requires that a minimum of Ashland, Southborough and Westborough stations open simultaneously (i.e. no more than 90 to 120 days between station openings). FEIR should make a commitment to this schedule *or* provide full disclosure of their station schedule and do full analysis of traffic, noise, etc. impacts for any station brought on line before the others. The host community should retain the right of refusal to bear these impacts albeit temporary. (1)

The Certificate permits MBTA to segment each station's FEIR. However, the CAC believes that the DEIR documented interrelationships of Ashland, Southborough and Westborough clearly requires one FEIR covering these three communities. (2)

Due to this high degree of interdependence, we urge the Secretary to scope the upcoming FEIR accordingly.

GP2

Assessment issues have been an ongoing dispute between the communities and the MBTA during the ENF stage and then with the CAC throughout the development of two DEIRs. Despite assessments: being scoped; the CAC revisiting the issue and voting it to be germane to our discussions; and our providing a proposed work program for how to answer the assessment question; the MBTA still refuses to do more than cite the existing law. The CAC has decided we are at an impasse. The Secretary can decide whether to push this issue further in the FEIR. However, this action should not be interpreted as acquiescence on this issue. Several communities have clearly stated they need assessment assurances or they will not accept a station. (3)

Failure to address the issue now may still result in environmentally feasible station locations being rejected by local leaders due to perceived financial risk.

GP3 Refer to ES-5

The CAC had difficulty in reviewing the MEPA draft because the normal process is to compare all alternatives to find the best, but it appears that this document only had to prove the project "not to be infeasible". The FEIR should address what level of analysis is being used to determine the feasibility of the alternatives contained in this DEIR versus other alternative transportation solutions. (4)

Comment Letter No. 2

GP4

The Central Transportation Planning Staff's (CTPS) updated projection of ridership demand is now based on 1990 census data. One weakness which the CAC believes exists is under projecting demand from Holliston and the extent to which other MetroWest communities will grow. For instance the Westborough town planner indicates he has not been contacted by MBTA during the past 13 months regarding planned developments. CAC's knowledge of recent, rapid, building activities in this area suggest that ridership may increase more steeply than the projections indicate.

Were the CTPS projections done based upon overall Boston metro population or refined to reflect unique growth scenarios projected for those towns in this region? For instance, the projections below performed by MAPC for CTPS highlight this phenomenon.

	1990 - 2000	2000 - 2010
-- Ashland:	32%	11%
-- Marlborough:	10	3
-- Southborough:	8	2
==> Boston Metro:	1%	-1%

(5) CAC requests that CTPS review projections (this will likely require working with CMRPC) and with specific planning departments to consider building permit trends for the most current 36 months for Holliston, Hopkinton, Southborough, Westborough, Marlborough, Hudson, Ashland and Milford. Please provide CAC with an updated or confirmed projection based upon this review.

(6) GP5 Pg. 15-40 MBTA should divert traffic to collectors as opposed to local streets. For instance: Southborough desires to close the Cordaville Road / River St. intersection to protect the neighborhood and decrease congestion at the North parking lot and General Store entrances. This may increase traffic flow at the River and Southville Roads, but that is where the problem should be handled on a State numbered road as opposed to a side street. Traffic signals should be altered to handle increased flow even if grading and drainage improvements are required. The MBTA is building the station and creating an impact. Sound planning principles dictate that traffic should be directed to a signalized intersection and away from densely settled residential neighborhood.

(7) GP6 Tables 12.15 - 12.18 No performance indicators were presented in the level of service summaries for each station in accordance with EOTC/MEPA guidelines. Presentation of the performance indicators in the FEIR will assist reviewers in determining impacts to traffic operations which do not result in a change in level of service. It is important to understand which end of the "range" for a particular level of service a facility is or will be operating at.

(8) GP7 ES-17 The DEIR measures traffic impact in terms of LOS decreases only. CAC believes *intensity and duration* of impacts are both issues. For instance, in Southborough, the DEIR clearly shows that the peak traffic hour will be extended by station's peak generator hours during both morning and evening. The timeframe nearly doubles in the evening and will be very disruptive in suburban and rural residential areas.

Comment Letter No. 2

GP8		Install pedestrian gate system at grade preventing commuters from crossing tracks when train is approaching/departing. These may need to be designed so as to prevent people from darting under them in their rush to catch the train. These should be designed as an adequate substitute for the presently planned overpasses.	9
GP9	3.7	pg. 3-50 CAC requests that the proponent reconcile its mitigation policy to acknowledge that "breaking it" (e.g. an existing service or system) relates to the length of time the proponent is causing diminished service, as well as, the degree to which the proponent is diminishing these services.	10
GP10		The construction of the new access drives/driveways to the commuter parking lots at the rail stations should not create new intersection traffic problems. Thus the access drives on Rte 122, Megunko Road and River Street need further study in the FEIR. A 1996 LOS D for a new intersection is not acceptable. New construction should be designed to a higher standard, C or better.	11
GP11		The work planned for this Extension should in no way preclude the electrification of this line. In fact, electrification should be a goal.	12

Executive Summary Comments

ES-10		The summary asserts that "Without great trouble" the MBTA could put more trains on the Worcester commuter rail line to help meet 1999 Clean Air Act standards. Where will these additional cars and engines come from? How "quickly can they be deployed"? Is their cost included in the $34M price for rolling stock?	13
ES-11		Since the 800-ft. raised platforms are no longer required, the need for straight track station siting would seem to be greatly diminished. Could this allow for reconsideration of previously rejected sites?	14
ES-13		The mini-high platforms leave a gap between the platform and the train. Is this gap variable? What is the range of its size? Can a small child's foot get caught in it, or a high heel?	15
ES-15		The MBTA assessment formula splits all costs of overhead between express and local service. For costs that are not directly attributable to one or the other, the division is based on total express services costs vs. total local costs. In other words, as the express side of the ledger becomes fuller due to expansion, express service becomes more expensive in the assessment formula.	16

Comment Letter No. 2

ES-15

(17) The first sentence is confusing. Are the Grafton sites privately or publicly owned? If they are privately owned, are the sites in the other towns publicly owned? This section of the DEIR should be more explicit and clarify this point since many readers may think their stations could ultimately become privately owned. (The CAC understands the land ownership status for each station, however we are already being questioned by people who have obtained advance copies of the DEIR).

ES-15

(18) Although the number of vehicle miles traveled is down, the kinds of emissions being saved is not proportionally reduced. The first and worst part of the trip, cold start to warm-up, will still be taking place in the short drives to the stations. The longer, cleaner part is the part which is reduced. This issue also arose at the time the Program for Mass Transit was being developed. CAC understands that the CTPS can model the "cold start" factor into its air quality standards. Did the model for determining air quality benefit contain a factor which offsets the "cold starts"?

CIRC-5

Jody Young (who was the JRTC alternate) replaced Mary Snyder in the summer of 1993 when Ms. Snyder resigned from the CAC.

Section 1: Project Overview

Sec. 1.5

(19) The statement that "The (Westborough MBTA Advisory) Committee expressed preference for the Smith Valve Parkway site" needs to be clarified. The Westborough MBTA Advisory Committee is charged to advise the Westborough Board of Selectmen, not the MBTA, and did not make the ultimate decision on preferred station location. The Westborough Board of Selectmen did not approve site selection at Smith Valve Parkway and has restated its position in support of a regional station somewhere in the vicinity of Interstate 495 and the Mass Pike. (This also refers to Section 11.5 Candidate Sites -- Westborough *Smith Valve Parkway* -- pg. 11-12 "this site was selected by both the MBTA Advisory Committee and the MBTA").

(20) Sec 1.1 Pg. 1-3 How many would be <u>additional</u> trains?

(21) Sec 1.3 Please correct table 1.3-3 since there are no spaces at the Newtonville stop. We question where MBTA obtained its numbers for parking spaces. Thus unavailability of parking does not deter 428 commuters from driving to this station and parking illegally -- challenging the constrained demand theory.

Sec 1.2 Pg. 1-9 and 3-47 "Authority cannot operate service outside district unless operating losses are reimbursed by some other entity."

(22) What is the Worcester Regional Transit Authority (WRTA) role in this project? Is WRTA contributing funding since Worcester, Millbury, Grafton, Westborough, Southborough (five of the six communities on rail extension) fall into this district? We understand that WRTA is providing funding for Union Station, however, this doesn't affect these other towns.

Comment Letter No. 2

Sec 1.3 Pg. 1-19 The CAC believes it is inadequate for the DEIR to say "Private bus ridership figures are not available as they are not public information." Real modal transportation figures are essential, since the direct comparison is actually between private, profit-making, bus services and the addition of a multi-million, subsidized commuter rail service. (Please refer the CAC comment on Sec 5.4.) (23)

Sec 1.4 Pg. 1-32 The DEIR does not indicate how many bridges and underpasses east of Framingham have to be rebuilt. If Framingham is as far east as the double stacked cars will be able to go, how does that make the Port of Boston intermodal? Why are we analyzing the cost of double stacking and raising bridges *west* of Framingham if this DEIR states that the line will only be double stack to Boston? Is not the goal to double stack rail lines to Worcester? (24)

Section 2: Needs Analysis

Sec 2.2 Also 5.2 We need more than the data provided to understand why this is the service area, especially since MBTA estimates that patrons for Worcester Extension will be drawn from 6 miles or fewer from the rail line and not from much further than 10 miles away. The model may need to run for a portion of the community (e.g. traffic zone or census tract) as opposed to entire population of communities (see figure 2.2-1). (25)

For example, the study area includes the town of Milford as part of the cachement area for the Worcester Extension. Franklin is more accessible given the proximity to I-495. The travel time along Route 85 will be greater than the travel time along I-495. Justification for the Franklin extension to Forge Park, was in part based upon ridership from Milford. CAC requests that the proponent clarify whether ridership is been double-counted for this project -- based upon the MBTA Forge Park project. (26)

Sec 2.6 Same comments as 1-32 above re inconsistency with bridge raising/track lowering is discussed all along route to Worcester. Why does DEIR describe service only as far east as Framingham? (27)

Section 3: Project Elements

3.2: Bicycle Access

Sec 3.2 [1a]Pg. 3-15 The recently enacted State Transportation Bond contains language requiring state transportation projects to consider how to make projects more suitable for bicycle use. Since it is proposed to defray the cost of this project with state funding, much more work will be needed in the FEIR to show how these stations will be multi-modal and in particular "bike friendly." (28)

29 The CAC requests all roadway improvements create bike path lanes e.g. Southborough Station to Hopkinton State Park. FEIR should detail what the MBTA plans are for improved bike access to their stations. This would decrease traffic count and improve air quality.

30 Sec 3.2 Pg. 3-12 Who is paying for the reconstruction of the interim station? Is Worcester Regional Transit Authority paying for any of the cost? If so, how much? The CAC is under the impression through the December 1993 Notice of Project Change that MBTA is paying for this. Is this expense part of the $78 M for this project? Where does it factor into the total project cost and also into the cost / benefit analysis?

31 Sec 3.2 [2] (Figure 3.2-2) Site plans in DEIR fail to address bike usage on site or on train. The CAC requests bike lockers be considered at all stations.

Sec 3.3 Also 3.6 Tables 3.3-1 & 3.6-1 indicate that no bridge raising was analyzed east of Framingham.

32 The MBTA is proposing to lower tracks along the corridor to provide the capability for double-stack freight service in the corridor. The work is described as "not necessary for the Worcester Extension, but would eliminate future service disturbances if EOTC moves ahead now with its double-stack plans." EOTC's original double-stack plans were for the northern tier tracks used by the Fitchburg Commuter Rail service, and was designed to meet the re-use needs of Fort Devens. Conrail and others objected to this being included in the Transportation Bond Bill. The MBTA should not pay the cost of lowering tracks or raising bridges as part of this project. The DEIR states that this cost will be subsidized by the EOTC, however the financial section does not itemize this cost in a means that is identifiable.

Sec 3.4 [1A] Pg. 3-39 <u>Commuter Rail Train Schedules</u>

"Approximate train schedules..." The proposed Basic Service schedule fails for a number of reasons:

Sec 3.4 [1B] 1. Assuming four sets of equipment based in Worcester, trains 502A, 504A, 506, and 506A must be covered by trains based in Worcester because the first westbound (505) does not reach Worcester until 30 minutes after the departure of the fourth departure from Worcester.

33

Sec 3.4 [1C] 2. Assuming that 505 turns for 520, the schedule needs adjustment because 510 cannot depart at the same time 505 is arriving. A minimum of 10 minutes must be allowed to detrain and entrain passengers, task the crews to change ends, contact the dispatcher and make the legally mandated brake test before departure of 510.

Sec 3.4 [1D] 3. Following this logic, 509 must turn for 514. The equipment would sit idle in Worcester. Train 513 would turn for 518 and, again, would sit in Worcester for one hour.

Sec 3.4 [1E] 4. Train 520A is scheduled for a 5:20PM departure from Worcester. Unfortunately, there won't be a train set in Worcester until 5:35PM, when 515A arrives.

Sec 3.4 [1F] 5. Assuming the problem with 520A is a schedule glitch and 520A really will have equipment to run with, then the afternoon rush hour trains will start arriving. Train 519 and 521 will put their equipment away in Worcester because there is no schedule for them to return east.

Sec 3.4 [1G] 6. Train 521A will turn for 526. 523 must turn for 530 using the proposed schedule with a layover of one hour fifty minutes. More than likely, 523 will put away in Worcester and the schedules of 527 and 530 will be corrected to allow 527 to turn for 530. Train 531 would be the fourth set put away in Worcester at night. (33)

Sec 3.4 [1H] 7. Train 505 will have to turn for 512 after sitting in Worcester for an hour and ten minutes. In fact 507 will have arrived before 512 leaves and two sets will be sitting in Worcester. 507's equipment will have a two and one-half hour layover waiting for 514's schedule. This is problematic from both equipment and crew scheduling perspectives.

Some may suggest shutting down the train set while it sits in Worcester. This is unlikely to occur because of the required time and tests that must be made after a set is restarted. Further, where does the crew wait during the layover? Moving the equipment to the layover facility would work, but by the time the necessary switching moves were made, it would almost be time to board passengers. These scheduling problems must be addressed in the FEIR.

Sec 3.4 [1J] It should be noted that at all MBTA points outside of Boston operating crews report 45 minutes to one hour before scheduled train departures. This equipment must be up and running by that time to ensure that everything is in working order. Mechanical inspections and tests are completed before time to allow for repairs or to get a replacement set (when practical) started or out of Boston to replace a train that may fail any of the federally mandated tests. (Each train must pass such tests before going into service each day).

Sec 3.4 [1L] Conclusion:

It would appear that adjusting the schedule to make it work is a simple matter. That is not the case. Every adjustment to either an inbound or outbound train affects the opposite direction train because the same set of equipment makes both an inbound and outbound trip. Therefore, multiple schedules have to be changed. This then puts the MBTA in the position of trying to determine whether inbound or outbound service in a given time frame has to be changed.

Sec 3.4 Pg. 3-39 This clearly states that Interim Service will not address Reverse Commuting or Weekend Service; then when DEIR discusses basic and expanded service it is silent on both topics:

a) Reverse commute - the schedules provide for it and the chart clearly indicates that the towns have people who work in Worcester. However, no ridership or air quality credits (34)

34 are taken for all these outbound stops in the a.m. or inbound stops in the p.m. The FEIR must calculate Feasibility and Ridership for reverse commute. It must also recalculate cost and air quality benefits if in fact there is additional ridership.

35 b) Weekend Service - Will there be weekend service as originally promised, under Basic Service?

Sec 3.4 Pg. 3-39 to 3-46 It has been emphasized that in order to get people out of the convenience of their cars, public transportation must be competitive with respect to both time and cost. It should also be reliable, clean and comfortable. Interim Service has been running on time in the morning and taking 60-70 minutes to get into Boston.

36 What will the timing impacts be as each station is added to the schedule? Buses and cars take 60-70 minutes from Worcester now and it gets respectively shorter for each town as you go east. Will the Basic Service still take only 60-70 minutes to get to Boston when the limited Interim Service presently takes 60-70 minutes.

37 Have there been problems with the Interim Service evening trains? CAC members who investigated were told trains can be up to 24 minutes late in the evening. As verification, the buses that are nearly empty in the morning started to pick up evening ridership as commuters learned the ride home was not time competitive. The FEIR should address all of these scheduling issues.

Sec 3.4 Pg. 3-43 to 3-46

38 If not included already, please include complete schedules for east of Framingham under the operation of Worcester Extension. The draft provided the CAC did not contain this data, and therefore, it was impossible to determine if new service has an impact on existing service (e.g. changes to station arrival time or deletion of an existing stop or stops).

Sec 3.6

Relationship to Transportation Improvement Program
Funding

39 The report claims that the Worcester Extension. is an element of the state TIP. Since state TIP must be exactly the same as the regional TIP, this statement is inaccurate. The MBTA did not place its non-federal aid projects in the regional TIP. The TIP should not be used as one of the justifications for the project.

Sec 3.6 Pg. 3-16

40 The cost estimates in the DEIR do not necessarily cover off-site mitigation such as sidewalks, traffic signals, intersection/roadway widenings and resurfacings. The FEIR should address what mitigation will be paid for with the $78 M budget and what will require other funding and from whom. It then should again address availability and timing of funding. All mitigation must be completed prior to the opening of each station respectively.

Sec 3.6 Pg. 3-47

Financial Feasibility

1. The MBTA financial analysis suggests that this service will have a cost recovery ratio of 42% and notes this exceeds the 35% goal set for MBTA services. The report does not suggest where the remaining 58% of the operating budget will come from. Given that the existing MBTA operating budget is funded at $40 million less than in fiscal '94, the level of transit service that is currently operating is greatly restricted by available funds. The CAC is concerned about where the proposed $7 million subsidy will come from without additional funding resources which do not appear forthcoming. While the $7 million operating deficit increase may seem small in terms of the total MBTA budget, since the MBTA's operation is decreasing, its new services will require reductions in other MBTA services in order to be accommodated. In addition, the per passenger subsidy of about $2.50 exceeds per passenger subsidies for even the poorest producing bus routes within the MBTA district. (41)

2. Before retiring from MBTA, Jerry Kennedy provided the CAC with cost recovery figures for this line. Presently the Framingham line has a great 64% cost recovery ratio. This drops to 42% with the extension, because Framingham to Worcester has only a 19% recovery ratio. The FEIR needs to break these numbers out better and explain if we are increasing or decreasing our cost recovery. The proponent also needs to explain what the specific implications are for the MBTA budget. (42)

3. Since the possibility exists that the actual level of service will be closer to "basic" than to "extended", there should be a separate revenue / cost analysis for each service level. (43)

Sec 3.6 Pg. 3-47 The standard that the MBTA Advisory Board and other independent review committees use is the ratio of Fare to the Net Operating Costs. This is consistent with the industry standard (for comparison with other systems) and is the historic standard of the MBTA (to compare its own improvement or lack thereof). It is commonly referred to as the FRR, the fare recovery ratio.

Sec 3.7 Pg. 3-50 The annualized capital cost figures assume a no interest bond or loan. Interest costs would conservatively double the annual capital interest expense budget. The 1990 Feasibility Study showed the OMB method for "annualizing" capital costs and suggested 10% of the total. This would result in an annualized capital cost of $9.7 million -- not the $3.3 million shown in the DEIR. (please also see page 4-12).

Please explain and detail the financing method and cost breakdowns in an amortized schedule (and correct associated tables). (44)

Section 4: Alternatives Analysis

Sec 4.1 Pg. 4-6 CAC requests the proponent to provide a model for bus ridership, with the bus subsidized at the same rate as is proposed for the Worcester Commuter Rail extension. (45)

Comment Letter No. 2

(46) Sec 4.1 Pg. 4-8 What year were these projections for?

Sec 4.4 Pg. 4-16 How did they reach this conclusion? Clearly the bus will carry more passengers at no cost to the public, and will cause less pollution than the train. In fact, the state makes money by taxing Peter Pan's profit. The CAC believes the DEP will allow a substitute (47) project in the same corridor, and HOV express buses certainly qualify. The FEIR must address alternative selection more cogently and cite specific criteria. This is a prime example of project selection on the basis of "not being infeasible" rather than the project providing an "optimal" solution.

Sec 5

Section 5: Ridership, Regional Traffic & Air Quality

Sec 5.3 Table 5.3-2 and pg. 17-3 CAC is concerned that any town (particularly Ashland) might be looked upon to provide more than its share of the burden for rail services. These concerns have been validated in the most recent DEIR. Although we maintain this concern, we do appreciate the direct and authoritative manner in which the reality is described in the DEIR. Specifically, the DEIR indicates " ....Ashland would more realistically become ..... the defacto regional station.." This is an unacceptable burden for Ashland.

Ashland has clearly stated to MBTA that failure of a site to be located in Southborough would negate any interest on Ashland's part for accepting a station. Furthermore, an Ashland station must come on-line no sooner than a Southborough station.

Southborough from the outset has been watching the response of Westborough to hosting a commuter rail station, and assessing the impact on Southborough's traffic if no station occurred in either Ashland or Westborough.

Sec 5.3 Also 17.2 Table 5.3-1 CAC acknowledges that individual communities need to carry some of the burden of providing rail service for neighboring communities.

Sec 5.3 Pg. 5-4 This DEIR was submitted to the CAC for pre-review just a week and half before Interim Service started. It would be helpful for the CAC members if the FEIR had a section (48) discussing the first month of Interim Service. We are particularly interested in the accuracy of the ridership projections for Interim Service versus actual counts. At one point in our CAC meetings, upon questioning consultants said any ridership projections can be off by as much as 20%. Small towns which are already predicted to have higher ridership than the second largest city in New England are understandably worried that the projections could be underestimating demand. This report on Interim Service could also provide other data such as impact on ridership when free parking became for-a-fee parking, noise problems, parking problems, cachement area of Worcester Interim Station, and whether schedule worked for both a.m. and p.m. routes.

Comment Letter No. 2

Sec 5.3 Pg. 5-8 The DEIR does not address the potential impact on existing bus service in enough depth. The CAC has had numerous discussions around the issue. The first draft which was withdrawn clearly indicated that the Worcester ridership will come off the Peter Pan buses as opposed to single occupant automobiles. (49)

Reports to the CAC since Interim Service began appear to bear out that projection. Buses that were running full in early September now have as few as 10 passengers. At a CAC meeting we were told that there would need to be a 13c Agreement between the private carriers and the MBTA because public expenditures would negatively impact their businesses. The CAC had asked that these agreements be addressed in the DEIR. Since they have not been, the FEIR should address their need, and if found to be necessary, how public funds will be committed in these agreements. Should not these financial agreements (if entered into) be added to the cost of the project? (50)

Sec 5.4

Existing Ridership in the Corridor on Public Transit

Sec 5.4 Pg. 5-8 The CAC was able to get ridership data from the Gulbankian bus by simply calling and asking them. Therefore, we do not accept the assertion in the DEIR that they could not obtain reliable private bus ridership counts because it is proprietary information. These figures should be better documented in the FEIR and the comparisons between bus and commuter rail analysis recalculated. Sources for this data include: (51)

- phone surveys of transportation companies
- DPU route documentation filed by the private carriers
- individuals riding the routes and counting numbers of passengers boarding at each stop within the 28 community service area.

Underestimating existing transit ridership will overestimate air quality benefits of the Worcester Extension.

Sec 5.5 Pg. 5-15 Wouldn't the increased speed on the Turnpike credit also apply to an expanded (or even subsidized) bus service? (52)

Sec 5.5 Pg. 5-16 Assuming 5-15 is true, please include the reduction here. (53)

Section 6: Socio-Economic Impacts

6Sec 6.4 As part of the scope of the EIR and the special procedure, financial analysis of the rail extension is considered. Under the present guidelines and revenue / cost projections, Ashland assessment would increase nominally with the inception of rail service. Ashland is the only community on the Worcester extension being assessed. Legislation has been passed, though not enacted, that would exempt Ashland from being the only community on this extension which would be assessed under the present formula. The CAC supports Ashland in it's requests in not becoming the only community which would be adversely affected in its budget with inception of rail services.

Comment Letter No. 2

	Sec 6.4	Pg. 6-7-10	Assessments:
54			Most members of the CAC disagree with the MBTA's statements concerning the likelihood of legislative reform of the MBTA district and its formula for assessments. The Boston Globe reports that a legislative subcommittee of the Joint Regional Transportation Committee has set an April 1995 deadline for developing a more equitable funding system. If the legislative commission revised guidelines in this timeframe, a new formula could be in place by fiscal 1996. For example, the Westborough station, projected to be used by only 22 Westborough riders out of a total ridership of 216 (Table 14.1-4, pg. 14-8), does not offer a great benefit to the town when weighed against potential costs for future MBTA assessments.
55	Sec 6.4	Pg. 6.8	A cap was placed on the reimbursement in 1983, so the refund to communities is getting steadily smaller. It is difficult to find this because there is no separate item on the "cherry sheet."
56	Sec 6.4	Pg. 6-9	Should show the Fare Recovery Ratio, as explained above.
57	Sec 6.5		Please define "equalized valuations for the prospective station site communities".
	Sec 6-6	[2]	Same as 6-5 [1]
			Section 7: Environmental Impacts - Railroad Right of Way
	Sec 7.11		Safety mitigation at West Natick, Wellesley Hills and Wellesley Farms is not addressed anywhere in this document. Even prior to the introduction of interim service, Amtrak, ConRail and several MBTA commuter rail trains passed through these stations at high speeds. All three stations require patrons to cross rail tracks to board or leave the train. Two of the three are also sited on curves, limiting visibility of approaching trains. The addition of 8 to 10 express trains per day will exacerbate this situation. Several improvements are suggested:
58			1. Better signage: -The current sign "Be Aware of Fast Moving Trains" is not a sufficient warning. - Identifying which trains, by train number, board on the outbound track is almost useless; more relevant information would be time of departure, for example (5:33 PM to Boston). 2. Pedestrian crossovers at both Wellesley stops and West Natick could be incorporated onto nearby road bridges without major construction.
59	Sec 7.3	Fig. 7.3-1	This chart provides three different thresholds used to determine unacceptable levels of noise impacts. Which agency, if any, has the legal authority to superimpose their standard on the others? What is the purpose of this chart in the DEIR? Are you using EPA standards or are you using Federal Transportation Administration (FTA) standards as stated on p. 7-15? If you are using FTA criteria, why are they not shown in Figure 7.3-1?

Comment Letter No. 2

Sec 7.3 Fig. 7.3-1 Federal agencies use different terms for what the CAC believes are the same intent. On the chart HUD speaks of "housing environment" while EPA addresses "ideal residential goal." Are these interchangeable terms, or do they mean different things to the two different bureaucracies? (60)

Sec 7.3 Pg. 7-12 The CAC does not agree that noise and vibration impact should only be calculated for residential uses. For example, Southborough still wants Fitzgerald's Store and Ipanema Restaurant assessed for noise and vibration impact both during construction and normal train operations. They are the properties closest to the proposed train stop. Ashland, Westborough and Millbury also have commercial uses very close to their stations. We ask that this be reviewed. (61)

Sec 7.3 Pg. 7-18 Ashland has two senior citizen housing facilities adjacent to railcrossings. Grafton also has rail crossing traffic which will increase by 100% under this service. There are specific concerns with the analysis of noise / vibration and wish to see further clarification of the mitigation for these impacts. (62)

CAC requests the MBTA, by it's generation of a nearly 100% increase in Ashland's and Grafton's rail crossings provide, in close coordination with ConRail, relief from locomotive horn blasts by installing a stationary horn (or other suitable technology) for rail crossing warnings. (63)

Sec 7.3 Table 7.3-1 On pg. 7-15 the DEIR states that FTA criteria determine impacts based on existing ambient noise levels. If you have a quiet area with ambient noise of 42 dBA, you can add as much as 10 dBA with no impact, but if it is noisy (i.e. 70 dBA) you can only add 1 dBA before you have an impact. Assuming this is all correct, then the MBTA should explain Table 7.3-1 Train Noise Impact Assessment at station locations. For example, Grafton has an existing dBA of 70. The standard explained above is that you can add 1 dBA to a 70 dBA with no impact. If you have an impact then the MBTA should mitigate. Yet Table 7.3-1 goes on to indicate they predict they will add 2 dBA with no impact. (64)

Which information is correct -- the 1 dBA limit stated on page 7-15 or the 3 dBA limit found in Table 7.3-1? It would appear that there are impacts in Grafton to which the MBTA is not admitting.

Sec 7.3 Table 7.3-2 The CAC shares Grafton's concern about the degree of noise impact they might incur. It was unclear how Table 7.3-1 says there are no impacts (albeit this is challenged in the above comment), and Table 7.3-2 then states 6 residences are impacted with Basic Service and this jumps to 26 units with Expanded Service. (65)

There is not enough explanation in the DEIR to make this understandable to the average reader. The FEIR should clearly explain and elaborate on these sound impacts in all of the towns. Data should not be buried in the appendix which requires a level of expertise not possessed by the average reader from the impacted communities. FEIR should do this work for the reader in an easily understood manner.

Section 7.3: Noise and Vibration

Sec 7.3 [2] Figure 7.3-2 DEIR plots a graph showing MBTA and Conrail locomotives creating higher noise level than AMTRAK locomotives. The logic appears faulty for two reasons. First, approximately 17 locomotives of the AMTRAK fleet are exactly the same type of engine that AMTRAK uses to haul its trains in the area under discussion; the F40PH engine. These locomotive engines run at a constant maximum RPM to provide electrical power to the coaches, in addition to providing propelling power to the wheels.

Second, MBTA has other types of locomotives known as F40PH-C class engines. These units have a separate donkey engine that supplies power to the coaches. The main engine is used exclusively for propelling power. As a result, the RPM's of the main engine are determined exclusively by the position of the throttle, the same as on Conrail's freight engines.

It is very difficult to believe that variable speed engines (which will not be in the higher throttle positions all the time in passenger service) generates louder sound levels than an engine which runs constantly at the maximum RPM possible. Interestingly, the dual engine locomotives are described on page 9-7 and it is clearly implied that such engines are quieter. Further, see Figure 9.3-1 on page 9-9 for what *appears* to be data in conflict with Figure 7-3.2.

66

These measurements may overstate the baseline noise dB levels which may result in a smaller increase from this baseline as service increases. Grafton and Westborough measurements will be actually higher, since the semi-enclosed environment (given the density of buildings adjacent to the tracks) produces more reverberation of train sounds.

Sec 7.8 CAC is awaiting comments of FEIR regarding historical issues before offering detailed comments.

Section 9: Environmental Impacts - Layover Facility

Sec 9.3 [1] Noise impacts from Layover Facility Operations

Sec 9.3 [2] CAC requires additional information in the FEIR regarding noise impacts at the Layover Facility. The assumptions outlined in the first full paragraph on page 9-7 created confusion for many CAC members. It would seem impossible to start a locomotive up, run all of the required tests, move the equipment from the layover facility to the originating station, board passengers and depart in 45 minutes -- at least not at the Worcester location because of the make-up of the operation. Trains do not go into service from the layover facility. They move to their originating station and sit there idling while commuters board. The paragraph is misleading. FEIR must clarify this issue.

67

Further, after all of the required tests are completed on equipment which has been started, the equipment would move from the layover facility east to a point in the general area between CP43 and MP 44 onto the main line.. The crew would change ends, make a brake test, get permission from the dispatcher to reverse direction west on the main line without signal indication, proceed west to Worcester station and reverse the process just described for the scheduled departure east from Worcester. Time is also spent boarding passengers who tend to "dribble in" a few at a time prior to departure time.

Due to the scheduling inaccuracies indicated, the FEIR should consider the likelihood of as many as three or more engine sets idling simultaneously over longer periods. Peak generation of noise is actually greater than the DEIR indicates. We ask that re-projections of noise and emissions be recalculated. (68)

Assuming it takes one half-hour to make the moves from the layover facility to the station, and a 45 minute start-up and inspection period (which we are told is below the Federal Railroad Administration average for an entire train set), the idling time in the immediate vicinity of the facility and the surrounding area is at least an hour and fifteen minutes, probably longer per set.

If two of the sets are the F40PH (not F40PH-C) class, there are then two engines idling at 900 RPMs each, in addition to any noise generated by the other equipment in the area.

The argument has been made that only F40PH-C units will be sent to Worcester to mitigate the noise problem. However, the second day of Interim Service saw the introduction of the F40PH to Worcester. The third day saw the noise complaints on the front page of the Worcester paper, complete with pictures. This must be resolved in the FEIR. (69)

The "peak idling period" is directly tied to the schedule, since the schedule determines when equipment must be started. Please see our comments above on the schedule and need for fine tuning of this schedule. If the schedule(s) included in the DEIR are adopted, noise in the immediate vicinity of the facility will be increased throughout the day by idling equipment waiting to make its scheduled turn back to Boston.

Sec 9.3 [3] The "peak idling period" is directly tied to the schedule, since the schedule determines when equipment must be started. Please see our comments above on the schedule and need for fine tuning of this schedule. If the schedule(s) included in the DEIR are adopted, noise in the immediate vicinity of the facility will be increased throughout the day by idling equipment waiting to make its scheduled turn back to Boston.

CAC requests that noise mitigation take place or the facility will simply become the subject of unending complaints. (70)

Sec 9.3 [4] Pg. 9-10 Under the heading "Noise", second paragraph, one of the "measures to minimize noise impacts..." is "(3) an active community liaison program." The CAC points out that the best liaison in the world simply cannot mitigate the way equipment is engineered.

Comment Letter No. 2

Section 11: Alternative Commuter Rail Station Sites / Design

Sec 11.0 Pg. 11-11

The DEIR states that "While a regional station is still a long term goal, the MBTA decided to concentrate efforts on extension of service to Worcester and leave the detailed planning for a regional station for another project to be scheduled at a future date."

71

The CAC disagrees. The site of a regional station should be settled -- prior to the construction of local stations. This CAC, the Westborough Board of Selectmen, Southborough Board of Selectmen, Westborough / Northborough Area Chamber of Commerce and the Westborough Rail Advisory Committee all strongly support the undertaking of a thorough feasibility study of an I-495 regional station as proposed in the Transportation Bond Bill. This study needs to be conducted before a decision is made on the need for local stations or their siting. Construction schedule and costs should be included in this study, as well as, further alternative siting combinations.

Section 12: Environmental Impacts - Millbury

72

Sec 12 Fig. 12.1-4

It is surprising to see no traffic accessing the station from the Mass Pike. CAC would expect riders from Charlton to arrive on the Mass Pike, as well as riders originating from communities west of Charlton, which may have been underestimated.

73

Sec 12 Table 12.1-5 and 12.1-8

The majority of the intersections studied for this station are located in Worcester, however, there is no mention of contact with the Worcester Police Department regarding accident history.

74

Sec 12.1 Pg. 12-14

The Route 146 / Mass Pike Interchange FEIS/FEIR shows a reduction in traffic volumes of approximately 20% on Route 20 west of Route 122 and 25% on Route 122 north of Interchange 11 with the proposed project, however the traffic analysis does not reflect this condition.

75

Sec 12.1 Pg. 12-14

The 1994 No-Build traffic volumes presented in the Route 146 / Mass Pike Interchange FEIS/FEIR on study roadways are significantly higher than those used for the 1996 traffic analysis. This should be explained.

Section 14: Environmental Impacts - Westborough

Sec 14.1

76

The CAC acknowledges there are specific questions pertaining to the traffic dispersion model (and how it was applied) at this Westborough site, specifically the traffic projections for Fisher and Maynard Streets. MBTA officials should work closely with Westborough to reconsider the assumptions in the traffic model and to re-run this model if necessary (e.g. conduct traffic counts at Maynard St. / Rt. 135).

Comment Letter No. 2

Sec 14.11		The CAC has received an update from MBTA stating that Westborough and Southborough will now have sidewalks, however the location of these is uncertain. The FEIR should state where these sidewalks will be located, the number of linear feet and any increases in site development budgets.	77
Sec 14.2	Pg. 14-26	Based upon recalibration of the traffic model (as described above), if traffic increases are shown to occur on Fisher and Maynard Streets, then air quality tests should be performed for residences and the schools along Fisher Street, due to vehicles using this area as a shortcut to reach Smith Valve station.	78

Section 15: Environmental Impacts - Southborough

Sec 15.6 [1]		Issues Scoped but not Addressed	
	Pg. 15-33 & 34	The scope for the DEIR told the MBTA to address how the Southborough station should fit into the character of the rural village business district, and how the granite bridge would be maintained as a gateway to Southborough. Neither issue is covered at all in this DEIR. Both needs detailed discussion in the FEIR.	79
Sec 15.1	Pg. 15-11	CAC does not agree with the DEIR projection that 50% of the Upton train riders already use Southborough as their route to the Mass Pike. To save time, Upton uses I-495 to the 11a entrance to Mass Pike. Traffic impacts resulting directly from the station should be adjusted upward in the FEIR.	80
Sec 15.5	Pg. 15-33	Based on its field trip to all proposed station sites, the CAC supports a recreation and landscaping project for Mill Pond, the Sudbury River and Stone Arch Bridge in Southborough. However, the DEIR gives no more than a couple of sentences to this topic. The FEIR should offer more detail.	81
Sec 15.10	Pg. 15-38	It has been agreed that sidewalks will be built in the proximity of Southborough Station, as well as on, the station site. This station has a high potential to service Hopkinton State Park. Thus, the sidewalks exiting onto Route 85 at the new access driveway should provide crosswalks to get park users on the right side of Route 85. The crosswalks may also need pedestrian lights to assist safe crossings during peak hours.	82
Sec 15.12	Pg. 15-22	CAC supports Southborough in strongly disagreeing with the supposition that traffic problems at the Route 85 / Southville Rd intersection can be remedied by merely retiming existing traffic signal. Instead of debating this, CAC requests that the MBTA petition MHD District 3 *now* to retime these lights, and then conduct additional, comparative analysis in the FEIR. Since the Route 85 bridge has been closed, traffic patterns have changed. MBTA should coordinate with Southborough how the address this issue in the recommended signal timing experiment.	83

Comment Letter No. 2

Section 16: Environmental Impacts - Ashland

Sec 16.0 Fig. 16.0-1 — Off set boarding platforms...

The problem is that the platforms are offset from each other on their respective tracks as much as 700 to 800 feet. We already know that both tracks will be signaled for use in both directions, therefore trains may operate on either track. The majority of the time, the same track will be used. However, there are commuter trains, AMTRAK trains, Conrail's freight trains to be considered and the Westborough rail / Auto Yard at MP30 off track #1. All of these will play a factor in the dispatcher's decision as to which track to route a train to on any given day.

Assume the passengers have all gathered to board on either of the platforms and the train is routed to the other track. Now, passengers must walk the length of either platform to get their train. This is time-consuming process for the able-bodied. It will be longer for the chair-bound especially since they only have 45 feet of platform space available to them and it is at the exact opposite ends from one another.

We strongly recommend that this style of platform alignment not be adopted, or that the offset distance be reduced. In re-routed situations, passenger track crossings could delay trains for 5 to 7 minutes, or more if there are handicapped passenger.

(84) Sec 16 Fig. 16.0-2 — DEIR shows 200 parking space capacity in Ashland, on the North side of tracks. Parking spillover is likely. Thus, the town would resort to restricted on-street parking between certain hours and also implement a "tag and tow" policy for controlling any parking lot spillover. The CAC requests a reevaluation of the proposed 200 parking spaces on the north side of the tracks.

Sec 16.1 — Ashland understands the challenges associated with development of this alternative and firmly believes that coordinated remediation of this property can be a win - win situation for the EPA and MBTA. This would require close coordination with EPA and Mass DEP.

(85) Sec 16.1 — The proposed Ashland West alternative is shown to have floodplain and some wetland. One potential solution is to break up the parcel into smaller "dry" parking lots (similar to West Natick) to avoid any wetland impact.

(86) Sec 16.13 Pg. 16-51 — Traffic approach and dispersion for the Ashland West alternative is somewhat problematic, given current road and bridge configuration at Pleasant & High St. How does the proponent plan to address this?

Sec 16.13	Table 16.1-8 & 16.1-14	The proposed access road to either East or West alternative from Route 135 would require signalization / integration with existing Route 135 signals. This must be addressed in the FEIR.	87
Sec 16.1	Pg. 16-48 & 58	CAC has a policy statement that sidewalks would be required at all rail stations to link them to pedestrians. Under the "west" alternative, DEIR does not indicate that Ashland needs them for access across the Cordaville Rd./ Pleasant St. bridge and as appropriate elsewhere.	88
Sec 16.17	Pg. 16-56	The DEIR and MBTA acknowledge the existence of floodplain, wetlands and sensitive areas on the proposed western alternative Ashland site. A site redesign may potentially avoid wetland impact. We reguest MBTA consider breaking the proposed south lot into parcels (much like the west Natick MBTA lot).	89

Section 17: Regional Station Analysis

Sec 17. [0] Sequencing /Timing Issues

This is an inadequate analysis of the regional station option, because it pre-supposes that all local stations are built prior to the regional station. Their market share is then slightly redistributed when the regional station is built, resulting in a low ridership and a "not cost feasible" determination. MBTA misses entirely the local viewpoint. We want a regional station instead of local stations. Do not build local stations by 1996 -- but rather put regional station on-line, then smaller stations if needed, e.g. Ashland. Southborough and Westborough would use the regional station.

Undoubtedly, the ACEC status of Cedar Swamp presents a problem for siting a regional station but positive, creative solutions may yet be found if really desired. The FEIR should continue to look at regional station option and not drop the topic as proposed in the DEIR. A conservative estimate of ridership totaling 1,290 patrons boarding at I-495 cannot be ignored. This number is conservative because it was obtained by running the 28 community cachement area model as opposed to looking at additional riders coming from the south, north, and west along I-495 and Mass Pike to get to Boston. 90

Sec 17.2	Pg. 17-3	"No specific ridership estimates were prepared for an alternative in which a regional station and all other intermediate stations except Westborough were constructed." The CAC had requested projection without Westborough and Southborough, at their meeting with the MBTA and its consultants on May 29, 1994. MBTA has told the CAC that it has the capabilities to develop this scenario. These omissions should be included in the FEIR.	91

Comment Letter No. 2

Sec 17.0		"A recent MBTA number plate survey in the parking lots of its Framingham terminus and other stations within the I-495 belt confirms that a significant patronage from central Massachusetts exists already. The demand can only increase with a Worcester boarding option." TELEGRAM & GAZETTE, September 15, 1994 -- " "An I-495 Regional Station."
App I	Pg. 1-308-9	Information regarding Fountainhead Plaza project is erroneous and out of date. Permits have been obtained for construction of a WalMart at that location. This project is progressing and it is reasonable to expect that it would be completed by late 1996. The WalMart project needs to be included in both the 2001 and 1996 "No Build" traffic projections.

92

Comment Letter No. 3

COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

SENATOR MATTHEW J. AMORELLO
SECOND WORCESTER DISTRICT
ROOM 314, STATE HOUSE
OFFICE TEL. (617) 722-1485
HOME TEL. (508) 839-4369

March 9, 1995

COMMITTEES:
WAYS AND MEANS
TRANSPORTATION
SCIENCE AND TECHNOLOGY
JUDICIARY
CHAIR — REPUBLICAN CAUCUS

RECEIVED
MAR 9 1995
MEPA

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Dear Secretary Coxe:

I am writing to submit comments on the Environmental Impact Report recently submitted by the Massachusetts Bay Transportation Authority relative to Commuter Rail in Central Massachusetts. As someone who has worked diligently on this project I am pleased to see that it has reached this point. I am confident that the extended commuter rail service to Boston from Worcester and other Central Massachusetts locations will have a positive impact on the economy as well as the environment.

The interim service presently operating in Worcester has surpassed earlier ridership projections. In doing so, there is a major reduction in air pollution from automobiles traveling from Central Massachusetts to Boston. I am confident that as other municipalities begin commuter rail service ridership numbers will also surpass expectations.

The Town of Millbury has requested that the Massachusetts Bay Transportation Authority explore access issues concerning the presently planned commuter rail station. Access from Route 20 in Millbury to the commuter rail station may be a viable option to meet this request. Congestion may be a result on local streets as commuters travel to the presently planned MBTA station in Millbury. (1)

Commuter rail service from Central Massachusetts to Boston is a safe economical and environmental investment. I am confident that municipalities planning to have MBTA stations are certain to benefit. Thank you for the opportunity to comment on this matter your consideration is greatly appreciated.

Sincerely,

Matt Amorello

Matthew J. Amorello
State Senator
Second Worcester District

MAR-09-95 THU 02:25 PM
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Comment Letter No. 4

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COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1054

SENATOR ROBERT A. DURAND
MIDDLESEX AND WORCESTER DISTRICT
ROOM 109C
TEL. (617) 722-1120

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COMMITTEES:
WAYS AND MEANS (ASSISTANT VICE CHAIR)
NATURAL RESOURCES AND AGRICULTURE (CHAIR)
COMMERCE AND LABOR (VICE CHAIR)
TRANSPORTATION
SCIENCE AND TECHNOLOGY

March 6, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Dear Secretary Coxe,

I am writing to offer my comments with regard to EOEA #9154, for the Worcester Commuter Rail Extension Project. I appreciate this opportunity to offer my input.

First of all, I strongly support the project in general. I envision this project as an outstanding opportunity for the businesses and communities of Central Massachusetts. The extension will provide the region with another vital economic link to Boston, and will allow the state to reap environmental and traffic mitigation benefits as well.

That being said, I must point out what I perceive to be a severe shortcoming in the scope of the planned intermediate stations between Framingham and Worcester. In particular, I must reiterate my concern that a regional approach to an intermediate station be given more study and consideration. (1)

As you know, I was successful in getting language added to the recently passed Transportation Bond Bill directing that the MBTA conduct a feasibility study of a regional station, to be built on Route 495. I continue to feel strongly that a regional station be given thorough study before a decision be made on individual stations in the towns. The discussion of the regional approach in the Draft EIR was preliminary at best. It is not a feasibility study, in that it does not make an exhaustive or detailed analysis of the costs, benefits, ridership effects, or possible options of building a regional station on Route 495.

A more conclusive study is needed for several reasons. First of all, it is entirely possible that the regional approach could be a cheaper approach, especially should some of the local towns refuse to have a local station in their community. Secondly, the ease of entering a regional station on Route 495 could draw many more commuters from the Route 495 belt, making the rail extension

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more successful. Finally, a regional approach in place of one or more local stations would help avoid traffic and other adverse impacts to these local communities.

With regard to a possible site for the regional station, I have discussed the situation with our congressional representatives, focusing on the possible acquisition of land currently owned by Conrail, and stand ready to continue this discussion and work toward a solution.

It is for these and other reasons that a comprehensive study is needed prior to further proceeding with the project. I hope that you will consider requiring the MBTA to conduct such a study, even if it delays the project. This issue needs to be settled before the project proceeds any further.

Again, I look forward to the opening of more stations along this line, and I await with excitement the economic benefits of the rail line. Thank you again for your consideration, and please do not hesitate to contact me regarding this or any other matter.

Very truly yours,

ROBERT A. DURAND
State Senate

Comment Letter No. 5

MAR 08 '95 11:55AM

The Commonwealth of Massachusetts

House of Representatives

State House, Boston 02133-1054

March 7, 1995

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MAR 8 1995
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The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

Dear Secretary Coxe:

(1)

I would like to offer my full and unconditional support for the Union Station Intermodal Transportation Center Project and the Worcester Commuter Rail Extension Project. Both of these projects are vitally important to a brighter future for the city of Worcester.

Over the next five years, Worcester will have committed a billion dollars of redevelopment initiatives to its downtown area. The success or failure of Medical City, the Convention Center, and the Worcester Common Fashion Outlet Mall will, in large part, depend upon drawing people from other areas into the city. An efficient and diversified transportation infrastructure is therefore one of the city's highest priorities.

Union Station would serve as the core of this transportation infrastructure, and provide the region with a vital link to other cities and towns. The Station's many assets, such as its existing rail access and location close to the downtown district, makes it a site uniquely qualified with which to base the area's transportation network.

The Commuter Rail Extension is a vital part of strengthening the Worcester transportation system. Since commuter rail was introduced in September of 1994, it has met with an overwhelming response, averaging over three hundred passengers daily, even with limited service. By providing these commuters with an alternative to driving, commuter rail is relieving some of the congestion on the highway routes into Boston. Under the present system, the trains are very limited in operation, due to their use of freight tracks. The Extension project would allow the commuter rail service to upgrade to Conrail tracks, a desperately needed step towards full rail access in Worcester.

With their regional importance, I urge you to approve both the Union Station and Commuter Rail Extension Projects. Thank you for your time and attention; I hope that you review these projects favorably.

Warmest regards,

Harriette L. Chandler

Rep. Harriette L. Chandler
13th Worcester District

Comment Letter No. 6

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF FOOD AND AGRICULTURE
LANCASTER REGIONAL FIELD OFFICE
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WILLIAM F. WELD
Governor

ARGEO PAUL CELLUCCI
Lt. Governor

TRUDY COXE
Secretary

JONATHAN L. HEALY
Commissioner

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MAR 8 1995
MEPA

MEMORANDUM

To: Trudy Coxe, Secretary
Executive Office of Environmental Affairs

Attn: MEPA Unit Nancy Baker

From: Marcia Starkey MS

Re: EOEA #9154 DEIR Worcester Commuter Rail Extension Project Framingham to Worcester

Date: 6 March 1995

The Department has reviewed the resubmitted Draft Environmental Impact Report with respect to potential impacts to agricultural resources. As a state funded project, the provisions of Executive Order 193 apply.

No direct impacts to agricultural land resources would result from the project as described, although widening or reconstruction of Green Street to accomodate increased traffic to the Grafton Station could affect state-owned fields which are leased by this Department.

In comments on the Draft EIR, subsequently withdrawn, we requested examination of indirect impacts to the "urban edge agriculture" which may be affected by induced growth in the project service area. The Executive Summary (Page ES-14) and Section 6.0 (page 6-1) of the DEIR conclude that induced development effects will be minor and contend that land use is a matter of local control. We believe that the capacity of regional transportation projects to overcome local planning has been demonstrated.

Current literature suggests that mass transit lines do contribute to sprawl and only marginally achieve their mission unless population density provides real incentive to abandon automobiles. The severe loss of farmland in eastern and central sections of the Commonwealth, in particular, is linked to the higher land values of suburban corridors.

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Comment Letter No. 6

The Department recognizes the serious need for effective mass transit in Massachusetts and supports actions which will address this need while reducing sprawl. Such projects can also encourage the preservation of farmland for active local farms in "urban edge" communities by creating opportunities for direct sales and visibility to local markets. Several of the proposed commuter rail stations may offer such opportunities with minimal or no cost.

The Department requests that the proponent consult with the Department's Bureau of Markets during preparation of the Final EIR to explore cooperative efforts of this kind.

c/Andrew D. Brennan, MBTA

Comment Letter No. 7

The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

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MEPA

March 9, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Attn: MEPA Unit

RE: Worcester Commuter Rail Extension Project, Towns of Framingham, Ashland, Southborough, Westborough, Grafton, Millbury, and Worcester. MHC #9415. EOEA #9154.

Dear Secretary Coxe:

Staff of the Massachusetts Historical Commission have reviewed the revised Draft Environmental Impact Report for the project referenced above.

The DEIR contains a draft reconnaissance archaeological report prepared by Timelines, Inc. that was reviewed by the MHC on June 30, 1994; the draft report does not appear to have been revised since our comments. Timelines, Inc. should submit two (2) copies of the revised, final report for our review and comment. Specific areas recommended for intensive (locational) archaeological survey will be more clearly indicated when the revised report is completed. The DEIR proposes to include in the Final EIR summary results of the next stage of archaeological investigation: an intensive (locational) archaeological survey. MHC recommends that the intensive (locational) archaeological survey proceed as soon as possible. If potentially significant archaeological sites are located during the intensive survey, a site examination archaeological survey may be necessary to provide detailed information on the sites. MHC recommends that the FEIR includes summary analyses (to protect sensitive site locational information) on ways to avoid, minimize, or mitigate adverse impacts to any significant archaeological sites in the impact area. If at all possible, summary results of these more advanced archaeological investigations should be included in the FEIR so that project planners have fuller benefit of this information, can provide more advanced analyses at the time the FEIR is completed, and thereby streamline the review. Otherwise, an alternative proposal for analysis and review (e.g., through a Notice of Project Change) should be agreed upon prior to finalizing project plans.

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220 Morrissey Boulevard, Boston, Massachusetts 02125 · (617) 727-8470
Fax: (617) 727-5128 TDD: 1-800-392-6090

Comment Letter No. 7

(4) The MHC has received and is in the process of evaluating the over 170 inventory forms generated by the architectural survey of the project area. At the completion of the evaluation process, which is anticipated shortly, it is recommended that the MHC, the project consultants, and the project proponents will consult to discuss measures to avoid, minimize or mitigate impacts to National Register or National Register-eligible properties. This procedure will enable a full discussion of the potential impacts and the mitigation measures to be included in the Final EIR.

These comments are provided to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), M.G.L. Chapter 9, ss. 26-27C, as amended by Chapter 254 of the Acts of 1988 (950 CMR 70-71), and MEPA (301 CMR 11). Should you have any questions or require further information, please feel free to contact Edward L. Bell (Senior Archaeologist) or Allen Johnson (Director, Architectural Review) at this office.

Sincerely,

Brona Simon

Brona Simon
State Archaeologist
Deputy State Historic Preservation Officer
Massachusetts Historical Commission

xc: Local Historical Commissions
Diana Parcon, MBTA
Kate Atwood, USACOE
Joanne Vizziello, EPA
DEP
Ross B. Dindio, MHD
Michael Roberts, Timelines, Inc.

Comment Letter No. 8

MEPA
3/13

Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Protection
Central Regional Office

William F. Weld
Governor
Trudy Coxe
Secretary, EOEA
Thomas B. Powers
Acting Commissioner

RECEIVED
MAR 1 1995
MEPA

March 9, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Re: EOEA #9154
DRAFT EIR
WORCESTER COMMUTER RAIL
EXTENSION PROJECT

Dear Secretary Coxe,

The Department of Environmental Protection, Division of Water Supply, Central Regional Office (the "Department") has reviewed the Draft Environmental Impact Report (DEIR) for the Worcester Commuter Rail Extension Project, EOEA #9154, and would like to offer the following comments.

EIR Organizational Issues

The potential impacts to water supply resources such as aquifers and watershed protection zones are discussed in the specific station site drainage sections of the report. This presumes that drainage issues are the only potential impacts to water supply sources. However, the potential impacts from herbicide use along the tracks and bed and plans for snow removal or stockpiling within the recharge area of a municipal well or private well are important water supply issues and should be discussed in the Final Environmental Impact Report (FEIR). (1)

Water Supply Issues

1) Potable water needs

The DEIR describes each station in detail and notes that sanitary facilities will not be provided at any of the facilities. If this decision is reversed in future plans, please be aware that a Massachusetts Division of Water Supply approved potable source of drinking water must be used. Connection of the project's facilities to an existing public water system is allowed provided the public water system has the capacity to meet the facility's demand. Calculations to determine the demand and plans to install the service connectionto the public water system must be included in the notification to the Department. If a new source is being considered to provide the needed supply of water to the facility, the new source must conform to the Department's Drinking Water Regulations (310 CMR 22.00) and the Department's Drinking Water Guidelines and Policies. The proponent must proceed through the new source approval process and the facility must be registered as a public water system. Initial as well as regular monitoring for contaminants will be required. (2)

Plans for the Worcester layover facility include maintenance, storage, office space and sanitary facilities for all employees. Will this facility receive its potable water from the City of Worcester? Can the water system for the City of (3)

Comment Letter No. 8

3 Worcester meet the demand (drinking, maintenance use, sanitation, fire protection) required for the facility? Have any agreements been made at this time? If connection to a public water system is planned, cross connection control devices must be implemented where necessary.

2) Herbicide usage

4 Provide information in regard to the number of years and frequency with which herbicides have been applied along this segment of the rail. Which herbicides have been used in the past and which are being proposed for use in the future? Will herbicides be applied more frequently as a result of this project?

5 Conrail currently manages herbicide use. It is stated in the DEIR that Conrail has an approved Vegetative Management Plan (VMP) from the Department of Food and Agriculture (DFA). Will Conrail assume the responsibility of vegetation management and herbicide application in the future?

6 What are the potential impacts to public and private drinking water supply wells and public surface water supplies from the herbicide application? The DEIR states that the only herbicides that are being used are those approved for use in "sensitive areas." Does this mean "sensitive areas" as defined in 333 CMR 11.02, such as primary recharge areas of public water supplies?

7 Are the communities/local boards of health/conservation commissions notified of the vegetative management plans for the upcoming year (333 CMR 11.06)? Are these groups given a means by which they can inform the proponent and/or Conrail of the location of new wells adjacent to the project that therefore would require adjustment of the herbicide markers? Are these groups notified of the approximate date application will take place (333 CMR 11.07)?

8 What measures are taken by the proponent and/or Conrail to ensure that all the existing wells (private and public) and potable water sources under investigation for future use are identified and are accurately located on a map as part of the VMP? Is the most recent information obtained each year from the local board of health and/or the Department of Environmental Protection, Division of Water Supply?

9 It is stated in the DEIR that herbicides are not applied within 400 feet of any municipal water supply well, or 100 feet of any surface drinking water supply, or 50 feet of any private well. In contrast, the Rights of Way Regulations 333 CMR 11.04(2)(a) state that no herbicides shall be applied within 400 feet of any public ground water supply well. In addition, no herbicides shall be applied within the primary recharge area (delineated Zone II or one half mile radius) of a public ground water supply well except by selective application and not more than once every two years. It is important to note that public ground water supply wells are not limited to municipal ground water supply wells as is implied in the DEIR. The Department's definition of a public water supply is a water supply which serves 25 people a day at least 60 days per year or which has 15 service connections; it is not dependent upon ownership. Therefore, public water supplies include municipal and privately owned public water supplies. Accordingly, all registered public water supply sources adjacent to the project need to be identified and labelled on the plans/maps in the DEIR and addressed appropriately. The Department should be contacted for the most recent list of registered public water supplies in those towns. It is important to note that it is quite possible that not all sources that meet the Department's definition of a public water supply have been identified and registered. It is also

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appropriate to note that private water supplies are also vulnerable. Every precaution should be taken to be sure that all drinking water sources have been identified in the vicinity of the project.

In the future, it is recommended that the Department be contacted on a regular basis prior to herbicide application to provide input as to the most current listing of registered public water supply sources. The Department's regional offices should also receive a copy of the Yearly Operational Plan (YOP) if application is planned for the respective region regulated by the Department. (10)

These issues are important because of the 1993 implementation of the Phase II regulations in which public water systems (municipal and privately owned) are required to monitor for a costly myriad of synthetic organic compounds (herbicides and pesticides). The Division of Water Supply is actively trying to educate its regulated communities and the public on source protection issues. The use of herbicides and pesticides within the Zone I of a public water source, for example, is prohibited. The Zone I protective area will vary in size from a radius of 100 to 400 feet depending upon the pumping rate of the well. Even the use of "approved" herbicides within a primary recharge area (delineated Zone II or one half mile radius) or within 400 feet of a public surface water supply (Zone A) may at some time pose not only a contamination problem, but a financial hardship to a public water system both in terms of monitoring costs and treatment costs.

It is stated in the DEIR that there are "no herbicide zones" and "limited herbicide zones" along the rail. Describe what is meant by "no herbicide zones" and "limited herbicide zones." Provide necessary details including the type of application (selective or broadcast) to be implemented in each type of zone. (11)

Where are the herbicides stored and/or mixed? Any measures taken to prevent spills? How will herbicides be applied in the sensitive areas? How will unused chemicals be disposed of? (12)

3) Maintenance of herbicide spray markers

It is not stated explicitly in the DEIR that spray markers are utilized as the method by which the perimeter of sensitive areas are delineated. It is assumed that this is the case because the presence of spray markers were used to determine the locations of inlet and outlet structures. This should be made clear in the Final EIR. (13)

Field inspections of the track bed provided the location of the existing spray markers. The FEIR should include a map detailing the location of the markers and the zone types (no herbicide, limited herbicide, etc.) Where are the spray markers located and how are they mounted? Are the markers easily readable? Are markers replaced before they deteriorate from exposure to environmental elements? Are the markers reviewed prior to herbicide applications? The markers should be maintained so that they can be easily interpreted by the applicator. (14)

The proponent states that the existing inlet and outlet structures will be cleared of vegetative overgrowth and other obstructions. This suggests that considerable time has passed since routine cleaning (removal of debris and overgrowth) has been conducted even though the track has been in use. Do future plans include a regular maintenance program for removal of vegetation from culverts and other structures along the tracks? Mechanical removal of vegetation rather than chemical removal should be utilized whenever feasible. (15)

4) Railroad operations

It is not clear in the DEIR whether the additional track will be used strictly for commuter use only. Will there be any additional transportation of hazardous materials as compared to current operations as a result of the additional track? Consequently, will there be an increase in the potential for spills? Currently what are the provisions taken to prevent spillage of hazardous materials? Will any additional measures be taken? The Department strongly encourages the development of an emergency response contingency plan which can be implemented quickly in the event of a spill. (16)

If there will be an increase in the freight operations as a result of the additional track, does the proponent expect there to be any increase in petroleum hydrocarbon (PHC) pollution associated with the increase in usage of the rail? The proponent states that a significant increase in concentrations of PHCs along the rail corridor is not expected by the additional activity of restoring commuter rail service. (17)

5) Drainage, sweeping and snow stockpiling issues

Who will be responsible for parking lot sweeping programs and catch basin maintenance at each station? Is there any potential impact to water supply sources, public or private, from de-icing chemical and/or salt application to the parking lots or the stockpiling of contaminated snow? Will the proposed drainage systems adequately address contaminants from the parking lots such as salt, antifreeze, metals, oil, grease, etc.? (18)

6) Water supply issues by town

a) Millbury:

Two locations have been proposed as possible sites for the Millbury station (Route 122 and Route 20). Both sites are approximately one mile from the Oak Pond Well, one of Massachusetts American Water Company's primary sources of public water for the town of Millbury. Both sites have some hazardous material contamination and thus the potential for release to the soil and groundwater exists. However, it does not appear as though activities at either station site pose a threat to the Oak Pond Well. It is stated in the DEIR that additional studies are needed to address possible hydrologic impacts to local private wells in the area as a result of the proposed site work and stormwater drainage system. It is important that these studies be completed in order to determine if replacement or connection to town water for these private wells is necessary. (19)

The railbed is approximately 0.42 miles from the Interim Wellhead Protection Area (IWPA) of the Oak Pond Well. In addition, the railbed covers 0.35 miles of a potentially productive medium yield aquifer that would most likely be included in the Zone II of the Oak Pond Well when it is delineated. The railbed is also within 0.07 miles of a potentially productive high yield aquifer that is also likely to be part of the Zone II for this well. There is the potential for contamination of the recharge area for the well from herbicides applied along this portion of the railbed and general pollution associated with the railroad activities, including spills as a result of train accidents.

b) Grafton:

The proposed site of the Grafton station is not within the Zone I or IWPA of any of Grafton's wells. The railbed is, however, approximately 0.32 miles from the IWPA for Grafton's East Street Wells #2 and #3. Grafton's aquifer protection zoning overlay district does not include the proposed Grafton station site, but it does include almost one mile of railbed. The area covered by the railbed is likely to be included in the Zone II for these wells when it is delineated. Are herbicides being applied along this portion of the railbed? (20)

An environmental site evaluation of the proposed Grafton station site indicates the presence of trace concentrations of acetone and freon and levels of cadmium above expected background levels in the soil at the site. No pesticides or herbicides were detected above background levels in the composite surface soil sample. What are the background levels for pesticides and herbicides? Were the groundwater samples analyzed for pesticides and herbicides? (21)

c) Westborough:

The proposed station site and 0.2 miles of railbed are within the IWPA of Westborough's Otis Street Well. Both have the potential to be within the Zone II of this well when it is delineated. Development of another well for Westborough next to the Otis Street Well is also under investigation. Are herbicides applied along the railbed in this area? (22)

Approximately 0.67 miles of the railbed runs through the combined Zone II for Westborough's Andrews Street Wells #1 and #2 and Wilkinson Well. The railbed is also 0.35 miles from the IWPA of Westborough's Hopkinton Road Well and Morse Street Well (the area is also known as Cedar Swamp). It is likely that the railbed will be within the Zone II for the Hopkinton Road and Morse Street wells when it is delineated. Are herbicides applied in these areas? (23)

It is stated in the DEIR on Page 14-31 that the station site does lie within the Zone B contributing watershed area of the Andrews and Wilkinson wells as depicted in Figure 14.4-1. Two types of aquifer and direct recharge areas, A-1 and A-2, are also depicted on Figure 14.4-1 (attached). However, none of these terms were defined in the DEIR and they do not match current water supply definitions. Apparently, the source of this information is from the Westborough Aquifer and Watershed Protection Districts map completed by SEA Consultants in 1986. If this information is to be included in the Final EIR these terms need to be defined, however, it would be more appropriate to use recent water supply terminology, especially since these wells have an approved Zone II. (24)

It is stated in the DEIR that the quality or quantity of the recharged groundwater is not expected to change as a result of the station site. A more complete explanation should be provided. The quality and perhaps the quantity will be affected if the site is within the Zone B contributing watershed area. What precautions will be taken to prevent pollution from the parking lot (stockpiled snow, salt, oils, metals, etc.) from contaminating the groundwater? Are herbicides being applied to the trackbed in this area as well? (25)

d) Hopkinton:

(26) The railbed is approximately one half mile from Saddle Hill Country Club, a registered non-community public water system located in Hopkinton. The railbed and proposed station site are 0.25 miles from Carbone's Restaurant, a registered non-community public water system in Hopkinton. Is the proponent aware of these public water systems?

e) Southborough:

(27) The proposed station site is adjacent to an area of Hopkinton that is served by private wells. Benzene, toluene and acetone were detected in soil samples from the proposed station site, however, these have not been confirmed. Determine if there is a potential for impacts from the site work and stormwater drainage from the station site to these private wells. Could the homes served by these wells be connected to public water if necessary?

For additional information regarding water supply issues associated with this project, please feel free to contact Andrea Lemerise at (508)792-7650 ext. 3723.

Very truly yours,

Mary J. Richards

Mary J. Richards,
MEPA Coordinator

cc: Dave Terry, Director DWS - Boston
Jana Leung, DWS - CERO

p: alemeris\mepa\#9154ws.com

Comment Letter No. 9

central massachusetts regional planning commission

• Twenty Washington Square
• Suite 300
• Worcester MA 01604-4013
• Phone (508) 756-7717
• Fax (508) 792-6818

March 9, 1995

Ms. Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02002

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MAR 1 3 1995
MEPA

Attention: MEPA Unit

Reference: EOEA #9154

Dear Secretary Coxe:

The transportation staff of the Central Massachusetts Regional Planning Commission (CMRPC) has reviewed the Draft Environmental Impact Report (DEIR) for the Worcester Commuter Rail Extension Project.

CMRPC would first like to complement both the MBTA and its consultants for their efforts in producing a well organized and readable document.

Staff wishes to utilize its opportunity to comment by focusing on its appreciation for the comments produced by the ongoing efforts of the Citizens Advisory Committee (CAC). The comprehensive nature of the issues raised by the CAC reflect their in depth involvement in the process. Their comments encompass any specific concerns staff might have with respect to the project. (1)

Sincerely,

Carl E. Hellstrom

Carl E. Hellstrom
Transportation Program Manager

Comment Letter No. 10

10 —

Massachusetts Restaurant Association

95-A Turnpike Road, Westborough, MA 01581-2850
TEL (508) 366-4144 • 1-800-852-3042 (MA Only WATS) • FAX (508) 366-4614

February 5, 1995

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FEB 7 1995
MEPA

Secretary Trudy Cox
Mass. Executive Office of Environmental Affairs
100 Cambridge Street - 20th Floor
Boston, Ma. 02202
Attention: MEPA Unit

Re: EOEA #9154
DEIR - Worcester Commuter Rail Extension

Dear Secretary Cox,

I have just become aware of the possibility for a feasibility study regarding a regional commuter station in the Westboro area near routes 495 and the Massachusetts Turnpike. I am writing in support of such a study. (1)

As President of a state-wide trade association, and a resident of Western Massachusetts (Amherst), I am painfully aware of the difficulties commuting to Boston and would enjoy the opportunity of using public transportation. The current service from Worcester does not meet this need as it is difficult for someone from Western Mass. to get to the station.

The Mass. Pike at exit 11A in Westboro is very accessible and makes a lot of sense for anyone travelling from the West. It is only about one hours drive from Springfield and would alleviate for Western Mass. residents, the dreaded drive into Boston. To be able to drive to Westboro and to then sit back and take a commuter rail to Boston and to cab beyond from there, has a great deal of appeal to me, as I'm sure it would for many citizens from my area.

I would like to thank you in advance for your consideration of such a study.

Sincerely,

Chick Delano

Chick Delano
President

Comment Letter No. 11

NB

Massachusetts Audubon Society

208 South Great Road
Lincoln, Massachusetts 01773
(617) 259-9500

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MAR 9 1995
MEPA

March 8, 1995

Trudy Coxe, Secretary
Executive Office of Environmental Affairs
20th Floor
100 Cambridge St.
Boston, MA 02202

Attention: MEPA Unit

Re: EOEA # 9154, Worcester Commuter Rail Extension Project

Dear Secretary Coxe:

On behalf of the Massachusetts Audubon Society, I submit the following comments on the Draft Environmental Impact Report (DEIR) for the above referenced project.

As you know, Massachusetts Audubon is a voluntary association of people, representing 54,000 household members, and dedicated to preserving the biological diversity and water resources of the commonwealth. The Society has increased its involvement in statewide transportation system planning over the past few years, both in relation to environmental impacts of individual transportation projects, and also because of the effect transportation infrastructure decisions have upon surrounding land use. Over the past several decades, it has become increasingly clear that highway expansion is not the solution to traffic congestion, but rather contributes to sprawling development patterns, reliance upon single-occupancy automobile travel, and increased impacts upon the commonwealth's land, water, and air. Massachusetts Audubon generally supports commuter rail extensions and other forms of public transportation improvements, provided the environmental impacts associated with such improvements are minimized.

General Comments

The DEIR documents the general areas and types of environmental impacts associated with the project. This project would revive an abandoned commuter rail line, maximizing use of existing infrastructure (the railroad bed). Most of the project's significant impacts to land and water resources are associated with development of new rail stations.

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Comment Letter No. 11

Wetlands

Proposed wetland impacts have been reduced significantly since publication of the Environmental Notification Form (ENF) in 1992. Most notably, the proposed location of the Grafton station has been moved away from a previously proposed site that would have involved considerable wetland filling. The Final EIRs for the track improvements and individual stations should provide additional detail showing that all feasible attempts have been made to avoid and reduce impacts to wetland resource areas and buffer zones, and that impacts to wetland resource values have been fully mitigated.

(1)

Fencing

In the ENF, the MBTA had proposed to construct chain link fences along the right of way throughout the 23 mile project length, including the Westboro Cedar Swamp Area of Critical Environmental Concern (ACEC) and other predominantly undeveloped areas. The need for fencing has been reevaluated in the DEIR, and new fencing is no longer proposed in several undeveloped areas including the ACEC. These project modifications will reduce the impacts of the project upon wildlife.

The Society believes it is important to clarify, however, that the concern raised in our ENF comments regarding fencing as a barrier to wildlife movements and habitat utilization was not restricted to large mammals such as deer or moose, or to large scale herd movements, as discussed in the DEIR. Rather, Massachusetts Audubon was concerned about the fragmentation of habitat for numerous species that would occur through construction of miles of continuous fence. Fencing could divide portions of habitat used by many species, potentially affecting local populations of animals, for example through restrictions on essential seasonal movements or through isolation of individuals within populations for breeding purposes. Although some animals may be able to pass over, through, or under a chain link fence, not all species or individuals within a species will be able to do so.

(2)

Habitat fragmentation and isolation of local populations tends to reduce biological diversity over time. (see Harris, Larry D. 1984. The fragmented forests: Island biogeography theory and the preservation of biotic diversity; and MacArthur, Robert H., and Edward O. Wilson. 1967. The theory of island biogeography.) Similar concerns, of course, are associated with highways, subdivision roads, and general fragmentation of habitat from typical suburban sprawl type development. This is one reason why the Society supports reactivation of this existing commuter rail line over other options such as continued reliance on highway expansion projects and dispersed development patterns.

(3)

The Society requests that the MBTA carefully evaluate and weigh the public safety benefits and environmental impacts of future new fencing along all its lines throughout the commonwealth.

Comment Letter No. 11

Additional Information for Final EIRs

The DEIR contains a level of detail adequate to understand the project as a whole and alternatives that have been considered for siting of local rail stations between Worcester and Framingham. The Final EIR(s) should provide additional, site-specific details regarding rare species impact avoidance; wetlands avoidance and mitigation; and stormwater management system design for the railbed improvements and each proposed new station. (4)

Conclusion

The Massachusetts Audubon Society supports the project in concept, provided impacts to sensitive biological and water resources along the project corridor are minimized and carefully managed. The DEIR is adequate, and documents how project impacts have been reduced in some significant ways (i.e. reduction of wetland impacts and fencing, provision for stormwater best management practices at stations). The Final EIR's for the railbed improvements, and Final EIRs for new stations should provide additional details regarding site-specific impacts and mitigation. (5)

Thank you for the opportunity to comment.

Sincerely,

E. Heidi Roddis

E. Heidi Roddis
Environmental Policy Specialist

cc: Jane Sherman, MBTA
Conservation Commissions and Planning Boards: Grafton, Millbury, Worcester, Westborough, Southborough, Ashland, Framingham
DEP Central Regional Office
Metropolitan Area Planning Council
Central Mass. Regional Planning Commission

Comment Letter No. 12

SG

BICYCLE COALITION of MASSACHUSETTS

January 22, 1995

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attn. MEPA Unit
Ms. Trudy Coxe, Secretary, EOEA
100 Cambridge St.
Boston, MA 02202

re: EOEA # 9154, Worcester Commuter Rail Extension Project

Dear Ms. Coxe:

The Bicycle Coalition of Massachusetts appreciates the opportunity to comment on this project. We support this project as a means to reduce energy use and pollution, and to provide added transportation options.

The Draft Environmental Impact Report is too general to warrant comments on bicycle provisions at the specific station locations. We have already offered comments for MEPA reviews of proposed improvements at the Natick, Framingham and Worcester stations. Our comments for the other stations are similar: that bicyclists should be able to access the station by road and/or bicycle path from every direction, and that secure bicycle parking should be available. (1)

We note the potential of the proposed North Station-South Station rail link to increase the usefulness of the proposed Worcester extension, and we are pleased with the legislature's voting funds for design of the rail link. Future studies of the Worcester extension should examine its effects in connection with the rail link.

We also encourage the MBTA to consider measures to increase the scope and convenience of its Bikes on the T program which permits bicycles to be transported on MBTA rail lines, including extension of the program to the Worcester line; use of rolling stock which can easily accommodate bicycles and other large baggage items (the current double decker cars with the fold-up seats at their ends are a good example); and more locations and times at which bicycle passes (and other special needs passes) may be purchased -- especially important as many Worcester line passengers may never travel into Boston where the pass office is presently located. (2)

The Coalition once again expresses its appreciation of the opportunity to comment, and stands ready to discuss these topics further.

Very truly yours,

John S. Allen

Bicycle Coalition of Massachusetts

cc: Jane Sherman, MBTA

P. O. Box 1015, Kendall Square Station ✦ Cambridge, Massachusetts 02142 ✦ (617) 491-RIDE

Comment Letter No. 13

NG

Metropolitan Area Planning Council
60 Temple Place, Boston, Massachusetts 02111 617/451-2770 Fax 617/482-7185
Serving 101 cities and towns in metropolitan Boston

February 28, 1995

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, MA 02202

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MAR 3 1995
MEPA

Project Identification:
Project Name: Worcester Extension
Project Proponent: MBTA
DEIR: 9154

Dear Ms. Coxe:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Worcester Commuter Rail Extension. MAPC has had the opportunity to comment on this project several times in the past both within the MEPA process; on the Environmental Notification Form and the previous DEIR for this project, and as a member of the Citizens Advisory Committee. MAPC is concerned that comments we have made on this project, dating back to its first submittal as an Environmental Notification Form, have not been addressed. It is our belief that these concerns, dealing with the impacts of this project on MBTA finances, other MBTA services and regional air quality must be addressed before approval of the project. Therefore we recommend the rejection of the Worcester Extension DEIR.

MAPC is still concerned with the Worcester Extension Draft EIR. Our concerns are many, and are itemized in detail below. MAPC's three primary concerns with the DEIR are 1) we do not believe the DEIR adequately illustrates that the MBTA has the ability to operate this service without reducing existing funding levels for other transit services; 2) due to a number of problems with the technical analysis including the ridership projections we believe the air quality analysis over estimates the benefits of this project; and 3) the project does not conform with Americans with Disabilities Act requirements to meet the needs of the disabled. These and other issues follow.

1. Financial Feasibility

1.1 Impact On MBTA Budget

MAPC believes that the DEIR must address the MBTA's financial capability to maintain existing services along with funding service expansions. The financial capacity of the

(1)

Edmund P. Tarallo, *President* William G. Constable, *Vice-President* Donna M. Jacobs, *Secretary* Richard A. Easler, *Treasurer*
David C. Soule, *Executive Director*
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Comment Letter No. 13

(1) MBTA has direct impacts on air quality as fare increases and service reductions can be directly linked to both short and long term losses in ridership, increases in automobile travel and increases in air pollution. Therefore, the financial capacity of the MBTA is an environmental issue.

The MBTA reduced its operating budget by $40 million in 1994. It has proposed an additional $30 million decrease in the operating budget in 1995. These two cuts in operating funding have come as the MBTA has initiated several major capital projects that will require new sources of operating revenue. The Old Colony Railroad Extension and the South Boston Piers Transitway will increase operating deficits by about $37 million annually. Another project that has cleared the environmental impact analysis stage is the Newburyport Extension with an annual operating cost of $400,000. MAPC cannot understand how the MBTA will be able to afford to operate these services without reducing existing levels of service within the MBTA District or raising fares. If the next fare increase or service reduction, to help the MBTA to pay for this new service, leads to ridership losses equal to the last, the air quality benefit, if any, of the Worcester Extension will be lost.[1]

In the past, the MBTA has stated that service extensions outside the MBTA District were not paid for by district communities. In light of reductions in state subsidies to the MBTA, while local assessments are increasing at the Proposition 2 1/2 limits, this argument is empty. With cuts in state operating subsidies and increases in local assessments, cities and towns in the MBTA District are paying a larger proportion of the cost of providing MBTA services. Without increases in state operating assistance equal to the needs created by these new services, MBTA District communities will indeed be paying for these service extensions both through their assessments and through reductions in other MBTA services.

(2) Operating costs are an environmental issue, and should be made part of a modified scope. A project change, and a change in scope is clearly justified. In 1992, when the ENF was filed, the state portion of the MBTA operating budget was not in the process of being reduced by 15%. As recently as the 1993/1994 review of the South Boston Piers FEIR the MBTA financial capacity analysis was projecting increases in state subsidies, after only a one time cut of $16 million. This financial feasibility analysis was conducted for the Federal Transit Administration.[2] These reductions in the operating budget, raises questions on the ability of the MBTA to open new services and continue to operate other services at existing levels. This conundrum has led to fare increases and service reductions on bus routes, both of these leading to loss of ridership and increases in automobile travel. A complete financial plan for the MBTA is vital. Such a plan should consider the services offered, operating revenue and subsidies by mode, administrative

(3)

[1] The 1991 Fare Increase environmental review noted a 5.7% reduction in average weekday ridership (7/92 DEIR), this following a 2.2% reduction in ridership due to the 1989 fare and parking fee increases (11/90 FEIR).

[2] The South Boston Piers FEIR is more recent than the Old Colony Railroad Restoration FEIR referenced on page 3-48 of the Worcester Extension DEIR.

costs, and the location of the service/costs relative to the MBTA borders. With such a plan the fare structure and state subsidies could be more effectively reviewed. For instance, some inner city bus routes have the highest revenue recovery ratios of the entire system, yet serve the poorest population. Commuter rail service, which serves a much higher income clientele, has the highest per passenger operating subsidy, in fact this service will subsidize about two-thirds of the cost of each passenger at a per trip rate of between $4.80 and $6.80. (3)

MAPC does not believe that the DEIR provides a realistic review of the financial capability of the MBTA to operate this service without reducing service on other facilities or raising system-wide fares. Given the problems with comprehensively assessing the impacts of past fare increases, due to the analyses being conducted post-implementation, we recommend that the Secretary require the MBTA to provide a full financing plan. This plan should illustrate the sources and levels of future revenues that show that the MBTA can indeed operate this service along with the projects already under construction without adversely affecting other MBTA services.

1.2 MBTA Assessments

The MBTA was required, by the request from the CAC and in the Secretary's certificate, to provide a review of the financial impacts of the project on communities **if a policy change were made** and these communities became responsible for funding a portion of the costs of the service. This is not included in the EIR. The analysis included in the DEIR explains current law, not a possible extension of the current assessment procedures to communities outside of the MBTA District as has been required in the scope.

The MBTA did develop an analysis of the change in local MBTA assessments for MBTA district communities that illustrates the impact of the service on its members. An expanded version of this analysis should have been included in the EIR to gauge impacts of rail assessments on communities in the corridor that are beyond the MBTA district. (4)

1.3. Financially Feasible Alternative

The EIR provides a brief discussion of the existing fare structure for bus services and suggests that the rail fares will be much less than the existing bus costs. In the Feasibility Study, the subsidy for the rail service was found to exceed the total cost of the existing Peter Pan bus services in the corridor. Could a subsidy for the existing bus services, coupled with the Turnpike's Park and Ride program provide a greater benefit to the region for a lower cost? (5)

2. Air Quality

2.1 Consistency of Analysis

This project became a part of the federal rules related to the State Implementation Plan for Air Quality (SIP) on November 4th without a satisfactory air quality analysis. The MBTA has based the need for the project on SIP inclusion, however the analysis, as is discussed below, suggests that the bus option should be given strong consideration as a substitute for the rail service.

A first concern is with the consistency of the analyses. For instance:

- The Air Quality Analysis states that the CTPS ridership projections assumed all rail riders are from automobiles, none are from existing bus services (Appendix 6, page 2). In fact, the binary choice model used by CTPS (Appendix 2, Section 6) states that about 85% of all trips are from automobiles, with the remaining from private bus carriers (Appendix 2, Section 8 Highway Impacts). 6
- The CTPS travel model discussed in Appendix Volume II Section 2.0 suggests that the project will draw most of its auto trips from the Turnpike, while the air quality analysis suggests that only about 50% of the auto trips are turnpike users, and that only one half of that number are peak hour commuters. The result is the CTPS analysis finds morning peak period turnpike reductions of 125 vehicles between Worcester and I-495, 555 vehicles between I-495 and Route 128, and 1,400 vehicles between Route 128 and Boston for 1996. The air quality analysis on the other hand suggests only a reduction of 445 vehicles on the turnpike during the same time period. 7
- CTPS analysis provided both person trips and vehicle trip demands at all stations - this was in the form of identifying walk trips to stations, kiss and ride trips and the actual parking demand at each station. These figures appear to not be used in the air quality analysis which used basic adjustments for vehicle occupancy rates and developed separate kiss and ride figures. 8
- The air quality analysis suggests that kiss and ride trips at particular stations will originate from the town in which the station is located (Appendix 6, Section 2). Following this logic, of the 22 residents of Westborough using commuter rail at the Westborough station, 17 will be kiss and ride trips. This is an extremely high ratio. More likely, given the location of the Westborough station which is clearly more convenient to non-Westborough residents, residents of communities neighboring Westborough will provide a proportionate share of kiss and ride trips. Given that 90% of the riders at this station will be non-residents (Appendix 2, Table 9), one would expect that most of the kiss and ride patronage will be non-residents. This affects trip length for kiss and ride trips, overall VMT and emission of pollution. The traffic model used to develop the demand analysis for the rail extension should have been relied upon for developing VMT reductions and speed changes for the air quality analysis. 9

MAPC recognizes that some of the above comments may mean the project provides greater air quality reductions than taken credit for in the DEIR, however it is important that the analysis be carefully described.

2.2 Reduction in Emissions by Preferred Alternative

A second concern is with the different scenarios analyzed. The following illustrates the net change in combined volatile organic compounds (VOC) and oxides of nitrogen (NOx):

NET REDUCTION IN REGIONAL EMISSIONS IN KG/DAY

	NET CHANGE VOC+NOX	
	1996	2001
BASIC TRAIN	-146.60	- 64.44
BASIC BUS	-296.93	-226.99
EXPANDED TRAIN	- 30.80	51.36
EXPANDED BUS	-283.21	-215.88

All of the scenarios illustrate net emission reductions except the expanded train service in 2001. Since the expanded service analysis does not anticipate increased ridership in the DEIR, the numbers related to the scenario should be disregarded. Most gravity models would identify an increase in ridership from more frequent service, even if the number is quite small. Based upon the assumptions in the DEIR, to implement the expanded train service the state would need to find an air quality off-set for the emissions. (10)

2.3 Ridership Projections

A third air quality concern deals with the ridership projections themselves. The discussion of ridership projections suggests that the bus ridership levels may not have been based upon a gravity model, but simply assigned the train riders to buses for comparison. This level of analysis does not provide an accurate comparison of the two services. MBTA personnel noted at the October 1994 CAC Meeting that they believe that buses will not be able to attract or accommodate the same level of ridership as the trains. The demand modeling needs to be properly conducted for all modes in the analysis to accurately gauge ridership levels and air quality benefits. (11)

Comments 2.4 and 2.5, which follow, also raise questions that need to be explored within the framework of the air quality analysis.

2.4 Existing Ridership in the Corridor on Public Transit

(12) We believe that the estimations of the existing ridership on area bus services to be inadequate. There are contradictions between the recently completed Mass. Turnpike Study and this draft EIR We recommend that the MBTA could survey existing transit boardings at park and ride facilities in the study area to determine ridership levels. Since Appendix 6, which was not made available during the agency review of this EIR seems to suggest that existing bus ridership may have been disregarded in some portions of the demand analysis, this need becomes even more critical.

Under estimating existing transit ridership will overestimate air quality benefits of the Worcester Extension. We recommend that the MBTA conduct a survey of existing transit and HOV ridership in the corridor.

2.5. Relationship to Other MBTA Services

The analysis is unclear on the origins of commuter trips using this service. One would expect that this service will draw residents currently using MBTA services such as the Green Line at Riverside, or commuter rail from Framingham to switch modes or stations. It is unclear in the EIR how these changes have been accounted for. In Appendix 6, one (13) suggestion is that only Peter Pan riders will be drawn to this service. This would seem to be inaccurate given the demand suggested for Ashland and Southborough stations. How many of the users of these two stations currently use Framingham Commuter Rail Service? How many currently use the Green Line? Will the diversion of trips from Riverside reduce MBTA revenues for Express Bus, Green Line or parking usage?

The feasibility report for the Newburyport Extension notes that the extension will draw users of Ipswich Station to the new Northern Stations. There is no similar analysis provided for the Worcester Extension.

MAPC has reviewed 1990 census data to determine the transit mode split for trips to Boston from communities in the Worcester Extension study area. This follows:

COMMUTERS TO BOSTON FROM MAPC COMMUNITIES
IN THE WORCESTER EXT. SERVICE AREA

	1990 Commuters to Boston	Number of Boston Bound on Commuter Rail	Other Commuter Rail Destinations from MAPC Region	Total Commuter Rail Ridership
Ashland	810	164	41	205
Holliston	654	113	8	121
Hopkinton	296	45	0	45
Marlborough	702	48	9	57
Southborough	285	13	0	13
Total	2,747	383	58	441

The census reveals 441 riders on commuter rail from the MAPC communities in the study area. How do the 205 commuter rail riders in 1990 correspond to the estimated 377 riders in 1996 from Ashland Station? Were all of the 1990 commuter rail riders using Framingham Station? Were these existing rail riders estimated to be automobile trips in the air quality analysis?[3] How does the financial analysis for the Worcester Extension change if approximately one-fifth of the ridership are currently users of commuter rail?[4]

(14)

3. Compliance with the Americans With Disabilities Act

The MBTA has proposed to use "mini high platforms" to provide access for the disabled to the Worcester Extension commuter rail service. MAPC believes that this is not consistent with the aims of the Americans With Disabilities Act (ADA). In fact, the DEIR suggests the need for a waiver of these requirements from the Massachusetts Architectural Barriers Board in order to provide these platforms. Mini-high platforms, such as is in place at Salem Station, have been the subject of many complaints related to MBTA service to the disabled. As designed in the DEIR, the mini-high platforms will be at the Worcester end of trains. This will require a disabled person accessing a train at South Station to travel the length of the train to board a car that will be accessible for disboarding.

In addition, MAPC notes that the Worcester/Framingham service is identified in the proposed operating plans for the North Station/South Station Rail link to connect with the existing service to Salem and Ipswich. This link is intended to allow south side commuters to access north side employment sites. On the south side all rail stations have their mini-high platforms planned at the western-most or southern-most side of the station, i.e. farthest from Boston. On the north side all rail stations, similarly, have their mini-high platforms located at the end of the station farthest from Boston. Therefore, a train traversing the rail link tunnel, will not have its accessible car match to the platform on the opposite side of the city. It is imperative, where the state is about to expend $60 million to design and engineer the rail link, that all new services provide full accessibility for the disabled. Only by providing this level of access will proper compliance with the ADA be met.

(15)

4. Modifications of Right of Way for Double Stack Freight Services

The MBTA is proposing to lower tracks along the corridor to provide the capability for double-stack freight service in the corridor. The work is described as not necessary for the Worcester Extension, but would eliminate future service disturbances if EOTC moves

[3] Note that the appendices only mention diverting riders from existing bus service in the corridor. In particular, the air quality analysis, only suggests Peter Pan riders would shift at the Worcester and Millbury station stops.

[4] Framingham Station is in zone 4, passengers currently pay $2.50, Ashland and Southborough combined have 218 current rail users paying this fare. This results in only a $1.00 increase in fare revenue from these riders.

ahead with its double-stack plans. EOTC's original double-stack plans were for the northern tier of tracks used by the Fitchburg Commuter Rail service, and was designed to meet the re-use needs of Fort Devens. CONRAIL and others objected to this plan. The MBTA should not pay the cost of lowering tracks or raising bridges as a part of this project. The DEIR states that this cost will be subsidized by EOTC but the financial section does not itemize this cost in a means that is identifiable.

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In general, we should be supportive of cross-subsidies between freight and passenger services. However, since new MBTA extensions have their operating costs often paid for by service reductions along other lines and by eliminating bus routes, to subsidize freight in such a manner is counter-productive to the health of the regional economy.

5. Station Locations

The station locations have been chosen in part to avoid impacting residential concentrations or in town centers. This results in reducing the pedestrian accessibility to the stations. Consequently the traffic impact analysis suggests only the Ashland and Worcester Stations meet the needs of pedestrians. In the 1970's the Interstate highway system was built with the goal of avoiding where people were. This led to new areas of sprawl development. Stations need to be near town centers to reinforce existing concentrations of population and employment and to promote pedestrian access.

17

In particular, MAPC is greatly concerned about the impacts a mega-station at Interstate 495 will have on future development patterns. A station at I-495 will promote high-speed automobile access to rail services, as opposed to pedestrian travel which is consistent with the regional plan. MAPC recommends that the EIR analyze the impacts of station locations as they relate to promoting sprawl type development. We do not believe that the current EIR adequately addresses the growth impacts of the proposed rail facility, especially as they relate to automobile access. In particular any proposed mega-station needs to include a land use change study. We believe that the potential I-495 station, given the possible impacts, must be studied as part of the EIR process and not as part of a separate study.

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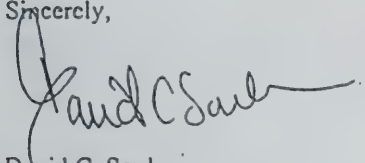
Funding is currently provided in the proposed Transportation Bond Bill for this analysis and it should proceed with due diligence.

Comment Letter No. 13

Thank you for the opportunity to review the CAC draft of the Supplemental Draft Environmental Impact Report.

Sincerely,



David C. Soule,
Executive Director

cc: Stephen Kerlin, Ashland
Charles Gaffney, Southborough
Dianne Shea, Framingham
Elizabeth Bransfield, Natick
Rick Brown, Wellesley
Eugene Bober, Newton
Christine Araujo, Boston Redevelopment Authority
Frank Tramontozzi, Boston Transportation Department
Kathy Bartolini, MetroWest Growth Management Committee
Rocco Mancini, MBTA
Anne Larner, MBTA Advisory Board
The Honorable William Bulger, President Mass. Senate
The Honorable Charles F. Flaherty, Speaker, Mass. House of Representatives
The Honorable Robert A. Havern, Chairman Joint Committee on Transportation
The Honorable Thomas S. Cahir, Chairman Joint Committee on Transportation
Steven Burrington, Conservation Law Foundation
Daniel J. Fortier, Chief Transportation Planner
Kent Stasiowski, Project Review Coordinator

Comment Letter No. 14

MEPA 3/8/95

Growth Management Committee
13 East Central Street
Natick, MA 01760
508·651·7350

NB

CHARLES E. GAFFNEY, CHAIRMAN, (Southborough Planning Board)
JOHN STASIK, VICE CHAIRMAN, (Framingham Planning Board)
MILTON E. GILBERT, CLERK, (Natick Planning Board)
JOHN MORAN, PAST EXECUTIVE COMMITTEE MEMBER, (Natick Board of Selectmen)
JAMES W. FALCONI, MEMBER AT-LARGE, (Southborough Board of Selectmen)

RECEIVED
MAR 8 1995
MEPA

March 7, 1995

Ms. Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Attention Nancy Baker, MEPA Unit
Re: EOEA #9154, DEIR, Worcester Commuter Rail Extension

Dear Secretary Coxe,

The MetroWest Growth Management Committee has been actively involved in the review of this project for several years now:

1. convened intermunicipal information meetings when the project was in the conceptual stages;

2. has the MetroWest Growth Management Committee Executive Director serve as Vice Chair of the Citizens Advisory Committee for this major and complicated project; and

3. reviewed the ENF and the first DEIR submitted.

Therefore, we have several issues to discuss in this comment letter. Please excuse the length of our comments, but this is a very important project for our subregion.

Prior to listing our concerns, the MetroWest Growth Management Committee wants to endorse in concept the extension of commuter rail to Worcester. In order to improve air quality and decrease traffic congestion, drivers must forego their private automobiles. The MetroWest subregion does not have enough alternative modes of travel to major destinations to enable drivers to do this. This commuter rail extension will help implement MetroWest transportation goals. Commuter rail is more popular than buses with commuters, because there is more room, no traffic delays and frequently faster trips.

Although we endorse the extension, we still believe the FEIR should provide more detail and better address the local concerns

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outlined below.

Citizens Advisory Committee
MetroWest endorses all comments made by the Citizens Advisory Committee and includes those comments as our own by reference herewith.

The CAC, appointed by former Secretary Tierney, met diligently for the first year of its existence, often on a twice-per-month schedule. Attendance was high and most people came with written prepared comments to circulate to other members. Due to the false start on the DEIR process, whereby over 30 pages of well-debated comments were filed by the CAC only to have the MBTA withdraw the document from MEPA review mere minutes before the MEPA Certificate was to be released, a one year hiatus for the active CAC resulted while the DEIR was rewritten. This caused the CAC to lose the momentum it had achieved. The CAC was reconvened only once in the summer to tell us about the new consultants and the new schedule, and then not reconvened until October. By then the interim Worcester service had begun. Anyone who has dealt with citizen participation programs understands the importance of momentum and consistent meeting schedules. The two meetings held in October had bare quorums. Possibly the absence of any Worcester members can be explained by service already being initiated, although there are still many issues to be resolved concerning the layover facility, noise and scheduling.

In late September the CAC received a very thick Volume One of the second DEIR. It soon became apparent that without the two volumes of appendices, we could not conduct our review. The CAC thus had 30 days (or less) to review a three-volume submission and write an intermunicipally agreed-upon analysis. Despite the now low attendance and participation, the CAC met the November submission deadline given by the MBTA, in order to have its comments included in the official MEPA submission. Then the MBTA missed its November filing and filed in December instead.

The CAC appreciates that the MBTA realized that the 60-day time frame for DEIR review was negated by the December holidays. After waiting well over a year for a DEIR, volunteers could not be expected to disrupt family holidays for DEIR meetings. Thus March 9 became the MEPA comment deadline. The general public and interested organizations needed this additional time. However, there was a downside to this necessary MBTA accommodation, i.e., another break in the momentum of the CAC.

In February, a CAC meeting was convened to discuss CAC comments filed in November and address other local issues that might have surfaced, but there was no quorum. People were there from Ashland and Hopkinton to express concerns they had with the DEIR and to ask the CAC to include them in any additional CAC comments filed. We listened but could not act due to lack of a quorum. The process has been so prolonged that the viability of the CAC is in jeopardy.

This history and the details provided above are provided as background to the MetroWest Growth Management Committee's request to Secretary Coxe to revisit the structure and membership of the CAC, and to instruct the MBTA to put more effort into making this citizen participation vehicle meaningful and inclusive. The CAC still has a lot of work to do. (1)

CAC Membership
It has become more and more evident as this project review evolves that there are two communities that will experience very direct impacts from this project which were left off the CAC. They are Framingham and Hopkinton. Often they come and observe CAC meetings but cannot vote and only add comments after members have had a chance to speak. (2)

Interim service has resulted in increased ridership in Framingham, as projected by MetroWest in our MEPA comments on the ENF for Interim Service. There are increased parking demands; new express service resulted in current riders changing arrival times; and traffic congestion has increased. Even more changes will come with Basic Service. This DEIR contends that ridership from Framingham may be diverted west to Ashland and Southborough when these stations open. We believe this ridership will be replaced with riders from Holliston and Sherborn, as the service improves. Framingham should be given membership on the CAC and these issues addressed prior to Basic Service starting.

The case for Hopkinton is made by its being an immediate abettor of the proposed Southborough station and might even have a portion of this station site in Hopkinton. The mill pond has the town border go through the middle. As planned the MBTA will be buying the mill pond as part of the station site and developing a recreation site, e.g., skating, fishing and jogging. Approximately half the shoreline is in Hopkinton. Also, based on the existing road network, the traffic entering the lower parking lot along Route 85 from Hopkinton, Upton and possibly Milford can only get onto Route 85 in Hopkinton Center. Thus Hopkinton will

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be impacted and should be an official member of the CAC.

Regional Station
Of the nine MetroWest communities, Wellesley, Natick and Framingham have stations along this commuter line and Ashland and Southborough are proposed to have new stations. Ashland and Southborough have had the opportunity to observe firsthand the impacts of MBTA stations on traffic and parking, particularly the regional station in Framingham. Thus neither small town wants to become the new regional station as discussed in Chapter 17 of the DEIR. These two communities draw (as opposed to generate) the highest ridership counts of this proposed extension, much higher than Worcester's.

The DEIR recommends dropping further analysis of the regional station along I-495 to some future unknown time. The MetroWest Growth Management Committee strongly disagrees. The State Transportation Bond included funding and directions to the MBTA to do additional work on the feasibility of siting a station along I-495. Such a station would be away from residential areas and local feeder roads. If a suitable site could be found along I-495, the Southborough station and its construction costs could be eliminated, or it could be a purely local village station built to a more appropriate scale.

The FEIR should conduct further study of a regional station solution. The ridership projections should not be based on local stations already in place with their own pre-existing ridership, but rather should be based on the regional station being the only station for Southborough and Westborough. Some ridership should also be drawn off the MA Turnpike and off I-495.

(3)

Southborough is especially concerned about becoming the regional station now that Westborough is so clearly saying, "It is an I-495 site or nothing," in that town. Southborough was already projected to serve almost all the Westborough residents utilizing the MBTA. Now Southborough would pick up Shrewsbury and Northborough riders as well. This is too much to ask of the smallest town along this rail route.

Ridership Projections
MetroWest has several concerns with the ridership projections in the DEIR:

(4)

1. Are these projections done by CTPS based on metro-Boston population projections (i.e., negative growth by

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2010) or are they based on MetroWest, SWAP and CMRPC growth projections for the catchment area (very high growth)? Town by town data should be used as opposed to region wide calculations that are skewed by cities losing population; (4)

2. How can towns have confidence in the accuracy of these ridership projections, if as reported in the newspapers the Worcester station has already reached MBTA 1996 ridership figures? We are glad the rail line is successful, but if this degree of underestimating spills into the towns, then their roads will not handle the traffic and the parking lots will be overflowing; (5)

3. This report fails to provide <u>any</u> ridership projections for Framingham. Interim service had significant impacts on the ridership. Basic service will add even more express trains. The FEIR must address what will happen in downtown Framingham through 2010 with the expansion of express service. Downtown Framingham may experience the heaviest impacts from this extension, but no mitigation is being offered to the town. The FEIR must remedy this omission; (6)

4. In all likelihood projections should not be done on the basis of town-wide ridership but rather on the basis of census tracts or transportation planning block groups already established. This avoids double counting ridership, e.g., Milford allocated to this line and the Franklin station; (7)

5. Although the schedules offered in the DEIR show many trains heading west from South Station to Worcester not one new rider is credited to the service. Everything is presumed to be a round trip initiated on the eastbound track. Some reverse ridership albeit small is inevitable and should be credited for air quality and cost/benefit calculations. Charts are provided in the DEIR that show that 1834 people already commute east to west from communities that might access this extension, but no estimate of how many of these people would use this train is given. We would prefer a better reverse commute schedule so ridership would be even higher; (8)

6. These projections use a trends model to determine modal split. The MBTA provides no information on what they

will do to entice drivers out of their cars and onto the train. This model is not at all proactive. What will the MBTA do to improve modal choice? If they do offer advertising and marketing programs (as they should), then the projections based on a status quo model underestimates ridership.

(9)

Assessments

Assessment issues have been an ongoing dispute between the communities and the MBTA during the ENF stage and then with the CAC throughout the development of the two DEIRs. Despite assessments: being scoped; the CAC revisiting the issue and voting them to be germane to our review; and the CAC providing a proposed work program for how to perform this assessment analysis; the MBTA still refuses to do more than cite existing law. Secretary Coxe, you should direct the MBTA to provide some estimates to municipalities concerning their assessments, if current law were to change.

(10)

Presently there is a Joint Legislative Study Committee researching how to change MBTA assessment practices to make them more equitable. Thus the MBTA's contention that the assessment formula has not changed in nearly 20 years and will not in the foreseeable future appears misleading. This committee is scheduled to report this spring.

(11)

The Transportation Task Force of the MetroWest Growth Management Committee recently agreed that all communities receiving MBTA services should pay for that service. This means that all the catchment cities and towns should also pay, not just station host communities. If such a system were implemented for lines such as Fitchburg and Franklin, as well as the new lines to Worcester, Newburyport and Old Colony, then the MBTA communities would more than double reducing the burden on the few that pay for everyone now. This would be a more equitable arrangement.

An even more equitable solution is the establishment of a statewide commuter rail authority. Thus assessments are an important part of this EIR, because 1) the financial wherewithal to operate this extension must be shown and 2) the financing must be equitable or current MBTA communities will attempt to prevent all commuter rail extensions. Commuter rail is the most popular alternative to the private automobile, and it should be expanded. Thus resolution to this financing roadblock must be found.

Comment Letter No. 14

Coordination of Commuter Rail with Regional Transportation Improvement Program
The capital budget for this project (minus new trains) is $78-million, however this does not account for any off-site mitigation which will be required. Intersection and sidewalk improvements alluded to in the DEIR do not appear to have any funding set aside for them. The FEIR should give a station-by-station accounting of improvements planned, the cost, the source of that funding and the timing of the availability of that funding, in order to assure that all mitigation will be implemented when each station opens. (12)

Pedestrian and Bike Accessibility and Usage
The DEIR does not provide any information on how these stations will be multi-modal, especially regarding pedestrians and bicycles. As roadway mitigation is being done to improve auto access to the stations, these roads should also be improved with sidewalks and bike lanes. The goal is to reduce auto usage. (13)

The stations should have bike lockers. It is also important that the Southborough station enable bikers and pedestrians to access Hopkinton State Park. This is a state-funded recreational facility within 1/2-mile of the proposed station. The FEIR should address how MBTA actions will improve accessibility to this site. (14)

The pedestrian crossovers planned for the station will be unsightly and difficult for the handicapped to use. The Transportation Task Force would prefer a less obtrusive means for crossing the tracks. For example, gates could be used that slide across the fence opening to prevent passengers from crossing tracks as trains arrive and depart. This would be a much less expensive approach with better design and more accessibility for the handicapped. (15)

Safety
The DEIR is totally focused west of Framingham. There have been safety issues east of Framingham since the start-up of interim service. For instance, in Wellesley people, unaccustomed to trains that do not stop in town, have assumed the incoming train was theirs and stepped in front of a train that was not stopping. Gate systems described above should also be installed at all stations along this line. This extension is establishing new schedules with safety impacts east and west of Framingham. (16)

Ashland
Regrettably the specific siting of this station has been in continual flux. This DEIR speaks of an eastern alternative and a western alternative. The MetroWest Growth Management Committeesupports the Ashland Selectmen and their selection of the eastern alternative. By locating a station here, the MBTA 1) helps eliminate the negative impacts of the Nyanza hazardous waste site; 2) opens up additional land for commercial and industrial development; 3) causes the least amount of impact to wetlands; and 4) allows Hopkinton and Holliston commuters to access the station without having to traverse the at-grade crossings downtown or on Cherry Street. MetroWest has learned that a new station rendering was given to Ashland that differs from that in the DEIR. This new design would cause several businesses to have to relocate. This is an unacceptable and costly alternative. The FEIR should supply a Nyanza siting option that allows current businesses to remain. Ashland cannot afford such a loss of property taxes.

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West Natick
The ENF for Interim Service did not include an evening express stop in West Natick, however, in January one was implemented. West Natick already has severe parking shortages and did not need improved train service prior to new parking. Why encourage more ridership at a station that cannot handle what it has? This change from the ENF should have at a minimum been discussed with the town of Natick and the CAC. Neither occurred. Demand at this station increased taking all shopping plaza parking before stores opened. A rent strike resulted. Natick would have prioritized improvements in their downtown station before an express service train for West Natick.

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Change Scoping Certificate
The scope issued by Secretary Tierney allowed the MBTA to file one complete DEIR and then individual FEIRs on each station. Based on the interrelationships documented in this DEIR among ridership for Ashland, Southborough, and Westborough, an FEIR for all three stations and the regional station should be done to fully assess impacts. Also no town should be brought on line before it is assured that its neighbors will also be coming on line within 90 days, otherwise no community will assume the risk of becoming the "new regional station".

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Comment Letter No. 14

Thank you for the opportunity to comment on this project. Please include MetroWest Growth Management Committee on the list of interested parties to whom any additional information is sent.

Yours truly,

Charles E. Gaffney

Charles E. Gaffney
Chairman

CEG/KB/pf

cc: MetroWest Growth Management Committee
MetroWest Transportation Task Force
David Robbins, MBTA Citizens Advisory Committee
Ed Bates, MAPC
Ashland Board of Selectmen
Ashland Planning Board
Framingham Board of Selectmen
Framingham Planning Board
Natick Board of Selectmen
Natick Planning Board
Southborough Board of Selectmen
Southborough Planning Board
Marcia Crowley, Wayland Board of Selectmen
Wellesley Board of Selectmen
Wellesley Planning Board
MetroWest Legislators
Andrew Brennan, MBTA

Comment Letter No. 15

Association for Public Transportation, Inc.
294 Washington St., Suite 750
Boston, Massachusetts 02108
(617) 482-0282

15

March 8, 1995

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MEPA

Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge St., 20th floor
Boston, MA 02202

Re: EOEA #9154

Dear Secretary Coxe,

The Association for Public Transportation (APT) is a non-profit organization founded in 1973 that supports improved public transportation in and around Boston. We are pleased for the opportunity to comment on the Draft EIR for the Worcester Commuter Rail Extension.

Although it is an improvement over the first Draft EIR, this draft still fails to address the Secretary's requirements to look at alternatives. The secretary's certificate on the ENF calls for alternatives analyses that evaluate and compare, among other things, alternatives to commuter rail service. The so-called alternatives analyses included in this Draft EIR do not indicate that any serious attempt was made to develop viable alternatives and to fairly analyze and assess them. This draft still reads as if the question was, "how do we extend commuter rail to Worcester," and not "how do we provide the best, environmentally benign, cost-effective transit service to the Worcester area.". The second question is the one that should have been asked and pursued.

Lack of Alternatives

It seems more and more as if the issue of providing high-quality transit service to Worcester is not the driving force here. The project took on a life of its own after being included in 1991 EOTC/MHD/CLF Memorandum of Understanding for the Central Artery/Tunnel project. However, the MOU required only that a feasibility study of an extension of commuter rail service be competed. To try to justify the project on the basis of CA/T mitigation benefits is a stretch—there is almost no commuter congestion on the MassPike that needs to be relieved by commuter rail. It is pretty clear to us that the MBTA wants trains to be running to Worcester and alternatives, both bus and train, and are not what they are interested in.

The MBTA's lack of creativity in analyzing other train and bus alternatives is irresponsible given this era of fiscal austerity. APT believes there is may be better train alternatives than the one proposed and there are bus alternatives that are also

1

viable. This proposed service is very expensive considering the ridership projected. The cost of project, $80 million, will be paid entirely with state funds. Why is the federal government not willing to fund 80 percent or at least 50 percent? By pursuing a project the feds are not interested in at this time we lose the ability to leverage the same money for a worthwhile project, something this state cannot really afford to do. (2)

Final EIR

Given the fact that this Draft EIR still does not look at alternatives in a serious way and that the Commonwealth cannot afford to fund a project that is not the best project our money can buy, the Final EIR should include analysis and discussion of the benefits of train and bus alternatives to the Worcester area. Following are suggested items for inclusion in FEIR alternatives analysis section:

- for train alternatives, the overriding principle to commuter rail expansion should be to provide train service where there is a market for trains and not to waste scarce funds on putting trains in uncongested corridors at the expense of others. The FEIR should try to explain how this project is going to relieve congestion on the MassPike if it is intended to. (3)

- regarding the station locations that were originally selected to be able to provide 800-foot raised platforms: since those platforms aren't needed now, the need for straight-track station siting is less. The FEIR should re-examine previously rejected sites in this light and the FEIR should address if the locations are capable of expansion if demand increases. Also, the FEIR should look at whether five stations are really justified in terms of ridership. (4)

- the FEIR should analyze for ridership benefits, etc., an alternative that would use the $80 million to improve bus and train service from Framingham. This would involve adding even more parking to the southside of the Framingham station and/or other existing stations and providing express train service from Framingham. It should also look at improving bus service from Shoppers World or another location for northside Framingham commuters. (5)

- the FEIR should look at an alternative that extends the Framingham line only to Ashland. (6)

- The FEIR should study a rail extension to serve the Marlborough riders the DEIR states it wants, i. e., a train that terminates at California Avenue at the Framingham Industrial Park. This station would provide access to both (7)

Comment Letter No. 15

Southborough and Marlborough commuters and would be convenient to Route 9, Route 30, and the MassPike.

- the MBTA should consider the fact that bus service has characteristics that are very attractive to many riders, such as better downtown distribution, etc. An alternative should be examined in which bus and train service are coordinated so they complement each other and aren't merely competing for scarce riders. (8)

- if the bottom line is to get drivers off the roads, the FEIR should look at the full impact of providing a subsidy for bus service to equalize the train-bus fares and it should include an aggressive bus service alternative. (9)

- The Massachusetts Turnpike Authority is expanding its park-and-ride facilities. A park-and-ride lot at the Route 495/MassPike interchange (Exit 11A) could be a particularly good location to capture bus commuters. This should be discussed in the FEIR. (10)

- again, the FEIR should analyze and quantify the impacts of equalizing the train fares with the bus fares. (11)

APT is in favor of expanding and improving access to public transportation services where feasible. However, in an era of limited public dollars, APT wants to make sure that the limited funding is spent on worthwhile projects. The DEIR does not prove that the proposed train service would provide the best transit service for Worcester. It is important that the Commonwealth target its spending on corridors with high degrees of congestion; take advantage of federal dollars when possible; and get drivers out of their cars. There is little point in spending millions of dollars just to shift transit users from a bus to a train.

APT looks forward to seeing analyses of alternatives, including some suggested above, in the FEIR to help convince us that the proposed project is indeed the best alternative from a number of perspectives. Thank you for the chance to comment.

Sincerely,

Dennis M. Campbell

Dennis M. Campbell
President

DMC/alm

Comment Letter No. 16

MASCO

4CC N

MEDICAL ACADEMIC AND SCIENTIFIC COMMUNITY ORGANIZATION, INC.

February 16, 1995

RECEIVED
FEB 23 1995
MEPA

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Attension: MEPA Unit

RE: DEIR for the Worcester Commuter Rail Extension Project - EOEA #9154

Dear Secretary Coxe:

Thank for this opportunity to comment on the DEIR for the Worcester Commuter Rail Extension Project. We are encouraged by the efforts of the State and MBTA to continue expansion of Commuter Rail service. MASCO and its member institutions aggressively promote the use of commuting alternatives in order to improve access to and the economy of the Longwood Medical and Academic Area (LMA), as well as help improve the overall air quality of the area. Additional Commuter Rail service will help us in achieving this endeavor. However, the DEIR is limited in that it does not include the potential for a new station at Kenmore Square (Yawkey Way), and its connection with the Urban Ring. 1

MASCO member employees and students who reside within the Worcester extension service area boundaries total over 500 people. The amount of LMA employees and students who reside in the service area is probably very similar to that of other employers, with an estimated total employment of 200,000, who are located along the Urban Ring corridor. These facts along with potential patient activity (in the LMA alone approximately 20,000 annual outpatient visits come from the Worcester extension service area) and the continued economic development along the Urban Ring justify an examination of a station in Kenmore Square.

Improved access to our institutions, as well as access to other employers along the Urban Ring corridor, is a key component, both currently and in the future, to our ability to thrive as contributors to the economy of the greater Boston metropolitan region and the Commonwealth. Not including a station at Kenmore Square, or at least evaluating the possibility of a station, would be a missed opportunity to opening up Commuter Rail service to a thriving economic corridor.

Sincerely,

R A Tassinari

Robert Tassinari
Senior Transportation Planner

A MASCO Group Company
375 Longwood Avenue, Boston, Massachusetts 02215-5328 617 632-2820 FAX: 617 632-2759
MEMBER INSTITUTIONS - Beth Israel Hospital - Brigham and Women's Hospital - Children's Hospital - Dana-Farber Cancer Institute
Deaconess Hospital - Emmanuel College - Harvard University (Medical School, School of Dental Medicine, and School of Public Health)
Joslin Diabetes Center - Massachusetts College of Pharmacy and Allied Health Sciences - Simmons College - Temple Israel - Wheelock College - Winsor School

Comment Letter No. 17

MEPA
3/20/95
15

MBTA Advisory Board

120 Boylston Street, Boston, Massachusetts 02116 617/426-6054 FAX 617/451-2054

March 8, 1995

RECEIVED
MAR 21 1995
MEPA

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
The Commonwealth of Massachusetts
100 Cambridge Street
Boston, MA 02102

Dear Secretary Coxe:

The MBTA Advisory Board's Capital Planning Committee has reviewed the Worcester Commuter Rail Extension Project DEIR on behalf of the Advisory Board and strongly recommends that you reject the current document. This DEIR does not fulfill the requirements of the Environmental Notification Form Certificate, dated October 22, 1992, and does not include certain basic information necessary to support the DEIR's selection of commuter rail as the most feasible alternative.

This letter only quickly highlights the Advisory Board's major concerns, but does not detail where the DEIR falls short of compliance with the Scope, outlined in the ENF. The MBTA withdrew the first DEIR because of a deluge of criticism; this Committee is now disappointed with the second DEIR. It again fails to provide information regarding some key issues which were identified as being either deficient or non-existent in the first round of reviews.

1. **ENF Requirement:**
   ". . . a thorough analysis of the demographics needed for successful implementation and re-established commuter rail service. What conditions have changed that would indicate that the re-establishment of service would be successful? The EIR should contain a needs analysis that identifies the service population and demonstrates the viability of the service."

Analyzing a Market for the Service

(1)

The current Draft does not contain a needs analysis, the most necessary ingredient required to address the questions of the "no-build" alternative and the comparisons of transit mode options. To evaluate and compare the "no-build" and other transit mode options, the Draft must study the potential need and market for the service. There has been no specific attempt to do that. Instead, the number of

auto trips in the Worcester Extension area is shown to increase while the needs of those commuters are ignored.

2. ENF Requirement:
". . . financial assessment of the project be included in the EIR."

Financial Feasibility Analysis

This DEIR is wholly deficient in its fiscal analyses of the project. No ENF Certification requirement would ever be satisfied by the paucity or skewing of economic data supplied in this draft. The fact that the draft uses an outdated financial feasibility analysis of the Old Colony Rail Restoration (OCRR) Project as its fiscal baseline is outlandish and inappropriate. In 1994, the FTA required the MBTA to produce an updated fiscal study on the OCRR. This financial analysis is not even due to be publicly released until May of 1995. (2)

In the face of the MBTA's recent budget cuts of $100 million, the Capital Planning Committee questions the MBTA's ability to absorb the costs to build and operate the Worcester Rail Extension while it maintains current service levels, infrastructure maintenance, equipment purchases and other capital outlays.

Potential Costs of Federal Section 13 (c)

The DEIR has failed to take into account the possible long term costs related to Section 13 (c) that may be incurred by the MBTA as a result of this project. Worcester Interim Service has already created a serious drop in passengers for the existing four private bus carriers.

Even though the Worcester Interim Service is funded with State monies, because the MBTA as an entity receives federal funds for its operating budget, it may still be subject to the mitigation requirements of 13 (c). If any project funded by federal taxpayer dollars is instituted, and directly competes with an already existing private service, and the private service is harmed or permanently damaged, the private service providers are entitled to reparation payments, not only on a one time basis, but for a seven year period. Since the topic is acknowledged nowhere in the document, there are no cost projections for this possibility whatsoever. (3)

3. ENF Requirement:

"The alternative analyses should evaluate and compare: 1) alternatives to commuter rail service, including the no-build alternative, ..."

> **"The analysis of alternative transit modes should address the comments. . . which ask for an understanding of the selection of commuter rail expansion instead of other transit mode options. The analysis should include a discussion of the relative costs of the alternative modes. The environmental impacts and benefits of the various mode alternatives, such as impacts to air quality, should compared (sic) and discussed (sic) in this evaluation."**

Alternative Analyses

This DEIR fails to fully or fairly analyze the various alternative transit modes. Discussions of costs and how they were calculated lack backup.

The analytical figures used in the report are from an out-dated 1989 Feasibility Study. What should have been necessary analytical data were omitted from the study of alternatives. Consequently the analysis of the "no-build" alternative is both inadequate and flawed. (4)

Figures presented do not compare equivalent measures. One of the best examples of this disparity lies in the tables on pages 4-12 and 4-14. The tables purport to examine equivalent net annual costs of the various alternatives, yet the tables on 4-12 and those on 4-14 do not use equivalent units of measurement. One striking example is the table on 4-14, where the costs for land are annualized over a 100 year period. Using that as a first measure to get to the net annual cost of the Commuter Bus Alternative is not the same method that was used on 4-12 to arrive at the net annual cost of Rail Alternatives. (5)

On page 1-19 of the DEIR, in paragraph 3, it states that "private bus figures are not available as they are not public information." That is an incorrect statement as the companies willingly and promptly provide the figures over the telephone. (6)

In choosing the commuter rail expansion, the Draft has completely disregarded an examination of the currently functioning private bus carriers. As it is currently laid out, the Bus Alternative is very distorted. It appears to base its costs and operational assumptions on the premise that the MBTA itself would run the bus service, not the private carriers which have specialized in transporting commuters from Worcester and its environs to Boston and Cambridge. Further, the DEIR uses Amtrak private service figures for the "no-build" alternative, but for the bus alternative, it uses MBTA public service data. (7)

None of this bus information is included in the DEIR, placing the Secretary in a position of having to make a determination without having all of the relevant facts.

Summary Conclusion

The Committee concludes that even though the Draft EIR may have made a case for the offering of some type of Worcester Commuter Rail Extension, it has not provided the necessary information to explain who will benefit from it and how; who will be hurt by it and how; what it will cost in its initial outlay and over the long term; whether or not all identified alternatives have been fully studied and analyzed thoroughly; whether or not the chosen alternative is the best transit alternative; whether the operative aspects of federal section 13 (c) will play a role in the fiscal costs of the project; and whether it will substantially help the Commonwealth meet the Clean Air Act goals.

Until all of these questions and items are addressed, the Committee finds the DEIR to be inadequate and unacceptable.

Sincerely,

Bernice C. Mader

Bernice C. Mader BCM
Chair, Capital Planning Committee

Comment Letter No. 18

3/3

Preservation Worcester
20 Washington Square
Worcester MA 01604

February 27, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

RECEIVED
MAR 6 1995
MEPA

RE: EOEA #9154
Worcester Commuter Rail Extension Project DEIR

Dear Secretary Coxe:

Preservation Worcester is pleased to present its review of the Draft Environmental Impact Report (DEIR) for the Worcester Commuter Rail Extension and offer our comments for your serious consideration.

Preservation Worcester endorses the concept of 5 interim stops between Framingham and Worcester to provide a reliable public transportation alternative to 28 regional communities.

PW has been a strong proponent of the Union Station Project. Central to the success of that project is its development as an intermodal transportation center . It will promote Worcester as a destination, stimulate downtown development and economic growth, and improve linkages throughout the region. The establishment of commuter rail service to and from Boston and points inbetween is critically important to this regional approach and long range development of downtown.

The DEIR defines an interim station and layover facility to be located adjacent to the existing Amtrak Station and close to Union Station. PW endorses this plan which would accommodate the existing demand for commuter rail now equaling over 500 riders a day. It also fully expects and plans for Union Station to become the station for the commuter rail extension, once rehabilitated. PW urges that plans to retire the interim station and remodel the layover facility be included in greater detail in the DEIR. PW endorses the Worcester Office of Planning and Development's request that the MBTA make the layover facility a double

(1)

(2)

(2) ended facility once Union Station is operational.

The issues of air quality and noise are of great concern to the residents of the area and will impact business and residential development in the area. Both issues are addressed in the DEIR . Analysis demonstrates a worst case scenario would comply with safe federal guidelines. The (3) reviews, however, were based on new trains, not older models. PW recommends guidelines should be established to assure that only safe, newer trains would be used, not the older trains which would not meet safe standards.

Thank you for your consideration of these recommendations.

Sincerely,

Patrice O'Malley Hagan

Patrice O'Malley Hagan
Chair, Urban Design Committee
Preservation Worcester

Comment Letter No. 19

CITY OF WORCESTER, MASSACHUSETTS

THOMAS R. HOOVER
City Manager

STEPHEN F. O'NEIL
Director

Telephone
799-1400

EXECUTIVE OFFICE OF THE CITY MANAGER
OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT
418 MAIN STREET, SUITE 400
WORCESTER, MASSACHUSETTS 01608-1885

February 24, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Attention: MEPA Unit

RECEIVED
FEB 2 4 1995
MEPA

RE: EOEA #9154
Worcester Commuter Rail Extension Project
Draft Environmental Impact Report

Dear Secretary Coxe:

Worcester's Office of Planning and Community Development (OPCD) has reviewed the Draft Environmental Impact Report (DEIR) for the Worcester Commuter Rail Extension. We offer the following comments for your review.

Project Justification

The Office of Planning and Community Development fully supports the Worcester Extension project and its elements. Local rail service ran continuously between Worcester and Boston between 1835 and 1975. The maturation of Boston's rim and spoke highway system and the widespread reliance on the automobile contributed a great deal to the demise of local service. This increased reliance on the automobile did not solve the problems of a region that continues to suburbanize. The City of Worcester embraces the establishment of commuter rail service from Boston to Worcester as a regional solution to long range transportation problems. Projects such as the Worcester Extension are also encouraged at the federal level through the 1990 Clean Air Act (CAA) and the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA).

This extension of commuter rail service is a key component in the downtown economic development plan. This project provides a needed transportation link to the Fallon/St. Vincent Medical City Project, a new Convention Center, the conversion of the Worcester Common Fashion Outlet, and the restoration of Union Station. Some of these developments, namely the Centrum and Worcester Common Fashion Outlet, are already underway or currently exist. These

existing sites draw thousands of visitors to Worcester in non-peak hours and on weekends. Also, Table 2.3-5 notes that approximately 3,900 people commute from the Boston Region to Worcester. However, the current interim service schedule does not provide for evening or weekend service from Boston to Worcester. In light of the important role passenger rail plays in Downtown development and the reverse commute numbers displayed in Table 2.3-5, OPCD encourages the project proponents to amend the current interim service schedule to include reverse commuting, non-peak hour, and weekend service.

(1)

Environmental Issues

Location of Layover Facility

OPCD supports the choice of Site 8 (Worcester, Conrail Yard, MP 43.5) as the location for the layover facility. While it does not accommodate a double ended facility, the location does offer the following benefits.

- Accommodates a facility with four tracks.
- Is located adjacent to the existing Amtrak Station and is within a mile of Union Station.
- The surrounding area is industrial and the facility is located in an existing rail yard.
- Location allows for personnel facilities and parking.

(2)

OPCD requests information regarding the remodeling of the layover facility once the rehabilitation of Union Station is complete. Also, once completed the rehabilitated Union Station will become the station for the commuter rail extension. The need for a passenger platform at the current Amtrak station would no longer exist. OPCD requests that the MBTA consider making the layover facility a double ended facility at that time. Such a remodeling may also eliminate the possibility for conflict between the facility and an existing sidetrack and allow larger vehicles to access the train sets.

(3)

Finally, there are no sensitive environmental areas on site, such as wetlands or municipal water supplies, nor does site evaluation show evidence of oil or hazardous materials in the soil or groundwater.

Location of Station

OPCD supports the location for the interim station with the understanding that Worcester's Union Station will become the terminus once rehabilitation is complete.

Noise and Air Quality Mitigation

While there does not appear to be any issues concerning wetlands and municipal water supplies, other potential impacts do exist. Trains will still be required to idle, thus creating potential air quality and noise impacts. In regards to air quality, the DEIR reviews a worst case scenario of the F40PH-2C and F40PH-2 locomotives likely to see service in Worcester. In this scenario there are no violations of the NO2 standard. The worst case scenario only reviews those locomotives that are likely to see service on the Worcester Extension, it does not review the potential emission factors of older locomotives such as the 1000-series (F40PH).

(4)

Comment Letter No. 19

A similar scenario is used in reviewing noise impacts. The DEIR notes assumptions regarding the idling needs of the newer 1050 series locomotives and provides for mitigation strategies. The DEIR does not mention strategies for the older 1000 series locomotives. Additionally, the DEIR provides the result of a "Pure Tone" Analysis in which the 1050-series meets the Department of Environmental Protection's guidelines concerning sound characteristics. The 1000-series does not meet these guidelines. (5)

Until such time that the MBTA can ensure and demonstrate that 1000 series locomotives will not be stored at the facility, OPCD requests that a mitigation strategy be developed for instances when the 1000-series locomotives are required to layover. The MBTA has already demonstrated a desire to cooperate with the City on this issue.

Construction Schedule

In light of recent events at the temporary layover facility, OPCD urges the MBTA to use all expediency in the construction of the new layover facility. The temporary facility is currently located in the Providence and Worcester rail yard and has been the target of criticism by abutting residents. The complaints are in regards to overnight noise and diesel fumes emitted by the idling engines. To the MBTA's credit, steps have been taken to minimize the noise and fume problems. Despite the changes, one engine will continue to idle throughout the night. Because layover operations may be considered more intrusive than normal train noise, the possibility for future complaints still exist. The sooner the new layover facility becomes operational the sooner the trains can be moved away from the sensitive receptors in the vicinity of the Providence and Worcester railyard. (6)

The City of Worcester Office of Planning and Community Development appreciates this opportunity to comment on this Draft Environmental Impact Report and trusts that any outstanding questions will be addressed to OPCD, 418 Main Street, Suite 400, Worcester, MA, 01608.

Sincerely,

Stephen F. O'Neil

STEPHEN F. O'NEIL
Director

Comment Letter No. 20

UNION STATION ALLIANCE

FOR THE RESTORATION AND REUSE OF WORCESTER'S HISTORIC TRAIN STATION

RECEIVED
MAR 1 [illegible]
MEPA

March 9, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: Worcester Commuter Rail Extension Project
EOEA Number: 9154
Draft Environmental Impact Report ("DEIR")

Dear Secretary Coxe:

The Union Station Alliance strongly supports the DEIR submitted by the Massachusetts Bay Transportation Authority for the Worcester commuter rail extension project.

Interim commuter rail service to Worcester has been an enormous success. Approval of the DEIR will allow the project to expeditiously move towards completion so that full service will be brought to Worcester by the end of 1996. There is enormous interest in full service in the City of Worcester, and the sooner it gets here the better it will be for both the City and the region. (1)

Full commuter rail service also is a critical component of the City's efforts to redevelop Union Station and the areas surrounding the Station. Without full service the intermodal transportation center planned for Union Station will be unable to fulfill all of its transportation responsibilities. This cannot be allowed to happen. The Worcester Redevelopment Authority is doing a terrific job keeping the Union Station development project on an aggressive timetable. Providing full commuter rail service to Worcester by the end of 1996 is a critical component of that

A CITIZEN'S COMMITTEE · SUPPORTED BY PRESERVATION WORCESTER
P.O. BOX 218, WORCESTER, MASSACHUSETTS 01613 TELEPHONE 795-3456

Comment Letter No. 20

UNION STATION ALLIANCE

development plan. We strongly endorse the commuter rail DEIR and urge your office to issue a certificate for the project.

Very truly yours,

Union Station Alliance

Union Station Alliance

AOD/jgm
cc: David P. Forsberg, Chief Development Officer
Michael S. Latka, AICP
William Purcell
George W. Tetler, Esq.

Comment Letter No. 21

ANDREW B. O'DONNELL
1700 BANK OF BOSTON TOWER
100 FRONT STREET
WORCESTER, MASSACHUSETTS 01608-1477
508-799-0541
FAX: 508-752-7305

RECEIVED
MAR 13 1995
MEPA

March 9, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: Worcester Commuter Rail Extension Project
EOEA Number: 9154
Draft Environmental Impact Report ("DEIR")

Dear Secretary Coxe:

I write to recommend that you approve the DEIR submitted by the Massachusetts Bay Transportation Authority for the Worcester commuter rail extension project and issue a certificate for the project.

I am a member of the Commuter Rail Task Force formed by the Worcester Area Chamber of Commerce to advise it on this project. I am also Co-Chairman of the Union Station Alliance.

Commuter rail service is a critical component of the City's efforts to redevelop Union Station. The Worcester Redevelopment Authority has done a great job keeping the Union Station development project on an aggressive timetable. Providing full commuter rail service to Worcester by the end of 1996 is a critical component of that development plan. I strongly endorse the commuter rail DEIR and urge your office to issue a certificate for the project. (1)

Very truly yours,

Andrew B. O'Donnell

AOD/jgm
cc: David P. Forsberg, Chief Development Officer
Michael S. Latka, AICP
William Purcell
George W. Tetler, Esq.

Comment Letter No. 22

3/14 MD

THOMAS R. HOOVER
CITY MANAGER

CITY OF WORCESTER

RECEIVED
MAR 1 4 1995
MEPA

March 13, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston MA 02202

RE: Commuter Rail / FEIR

Dear Secretary Coxe,

We are writing to express our support for the extension of commuter rail service to the City of Worcester from Boston. We apologize for submitting these comments after the March 9th deadline. However, our commitment to supporting commuter rail service is so important that we felt an obligation to write anyway. (1)

This project is critical to the City of Worcester as well as the entire Central Massachusetts Region. The City has been working for years to improve it's transportation infrastructure with projects like the Route 146/Masspike Interchange and the rehabilitation of Worcester Airport. Commuter rail service from Boston is the final link in our efforts. We are pleased that the interim commuter rail service that began in the Fall of 1994 is so successful. The most recent ridership figures are in excess of 400 passengers per day.

The rail link is critical to our downtown economic development plan. It will be the center link between a $170 million Medical City Project, a $33 million Convention Center, the successful Worcester Common Fashion Outlets, and the restoration of Union Station into an Intermodal Transportation Center. These projects will certainly bolster ridership figures. The Worcester Common Fashion Outlets has already brought over 3 million people to the downtown since November of 1994 and the Fallon/St. Vincent Medical City complex is expected to generate 1.5 million visits per year to the downtown.

Environmentally commuter rail makes sense. Commuter rail improves air quality, alleviates traffic congestion, and promotes other public transportation sources such as local and regional buses, taxi and shuttle services. All of which would be provided at our proposed Intermodal Transportation facility at Union Station which ultimately will be the final rail stop in Worcester.

OFFICE OF THE CITY MANAGER, CITY HALL, WORCESTER, MASSACHUSETTS 01608
TELEPHONE (508) 799-1175 FAX (508) 799-1208

Comment Letter No. 22

We would respectfully request a favorable certificate for the MBTA's Final Environmental Impact Report (FEIR). The MBTA and the City agree that the preliminary ridership estimates are conservative at best. We do not believe that an increase in daily trips will have an adverse environmental impact on the corridor. In fact, increases in commuter rail ridership means less traffic on our highways resulting in improved air quality. (2)

We thank you for your time on this matter and should you have any questions or require additional information, please feel free to call on us at (508) 799-1159.

Sincerely,

Thomas R. Hoover
City Manager

David P. Forsberg
Chief Development Officer

Comment Letter No. 23

Massachusetts Biotechnology Research Park

MEPA 3/15

March 9, 1995

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MAR 1 1 1995
MEPA

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston MA 02202

Attention: MEPA Unit

RE: Worcester Commuter Rail Extension Project - EOEA #9154
Comments on Draft Environmental Impact Report

Dear Secretary Coxe,

Worcester Business Development Corporation (WBDC), developer of the Massachusetts Biotechnology Research Park in Worcester and the proposed CenTech Park (EOEA #8798) in Grafton and Shrewsbury, wishes to express its strong support for the construction of the suburban stations on the Worcester Commuter Rail extension.

WBDC is the leading economic development entity serving Central Massachusetts. We believe that the provision of quality public transportation such as MBTA Commuter Rail will improve the quality of life and economic well-being of communities along the Worcester-Framingham corridor. The siting of the Grafton station on Pine Street enhances the attractiveness of our abutting CenTech Park development among prospective biotech and high tech manufacturing tenants. We expect that a significant number of reverse or off-peak commuters will use the train to access our project and the adjacent Tufts Vet School, and we look forward to the approval of the EIR and the prompt commencement of station construction.

With that said, we wish to comment on the description in the DEIR of Grafton Station traffic impacts. The traffic study apparently does not assign any station traffic to Green Street in Shrewsbury. Green Street is the continuation of Pine Street which connects to Route 20 opposite South Street in Shrewsbury. We suggest that the proponent should have assigned some project traffic to Green Street. We note that in your Certificate on the Notice of Project Change for CenTech Park (EOEA #8798 1/11/95), which abuts Grafton Station on Pine Street, you required WBDC to include in its DEIR traffic analysis "the signalization of Route 20/Green and South Streets as well as a discussion with respect to the necessary safety improvements of Green Street". Because the CenTech Park

1

One Innovation Drive Worcester, MA 01605 508.755.2230 Fax 508.754.9487

Comment Letter No. 23

MEPA filing predated the MBTA filing, we believe it would be inequitable to allow the MBTA to omit study of Green Street and any possible mitigations there.

Thank you very much.

Sincerely,

Thomas J Andrews

Thomas J. Andrews
Project Manager, WBDC

Comment Letter No. 24

2/6/95

February 1, 1995

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FEB 7 1995
MEPA

Ms. Trudy Coxe
Secretary of Environmental Affairs
Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Room 2000
Boston, MA 02202

RE: EOEA 9154
Comments on the DEIR for the extension of commuter rail service to Worcester.

Dear Secretary Coxe:

The MBTA Advisory Committee to the Millbury Board of Selectmen provides the following comments for your consideration to the DEIR for the extension of commuter rail service to the City of Worcester.

1. Site Drainage
We suggest that the level of detail in the Final report be expanded with respect to the maintenance responsibility for catch basins, silting basins, grease traps and other drainage facilities. (1)

2. Archeological Resources
We would like to see the intensive archeological survey that is promised in the Final report. (2)

3. Site location
We suggest that the DEIR fails to adequately support the need to locate the commuter rail station in the vicinity of the Massachusetts Turnpike. (3)

4. Traffic
We ask that the Final report provide more traffic mitigation information than is available in the DEIR at section 12.12. (4)

5. Traffic
Current traffic data from the Central Massachusetts Planning Commission appears to indicate that the intersection of Route 122 and Route 20 in Worcester may warrant some amount of traffic mitigation. (5)

Comment Letter No. 24

6. Traffic Mitigation
We ask that additional traffic mitigation information be included in the Final Report. (6)

7. Summary of Findings
Some members of our committee suggest that the Summary of Findings in the DEIR tends to simplify the difficulty faced by persons who live within the "study area" to enter or exit their streets or homes from Route 122 during certain peak hours. (7)

8. Surrounding Land Use
We find it difficult to support the taking of any property. (8)

9. Proposed Route 20 Access Road
We believe that the Route 20 Access Road design may be improved to better encourage economic expansion along Route 20. (9)

10. Economic Development
We believe that more economic development will be encouraged by the location of a commuter rail station with an access road from Route 20 than will be encouraged by a commuter rail station with an access road from Route 122. (10)

11. Safety
Given the remote nature of the station sites, we ask that the Final Report address the relative safety of individual passengers waiting at either of the two proposed Millbury stations. (11)

12. Bicycle/ Pedestrian Access
We ask that the Final Report evaluate which station site is more conducive to encouraging commuters to walk or to ride bicycles to the station. (12)

Comment Letter No. 24

Respectfully submitted on behalf of the members of the Millbury MBTA Advisory Committee:

Brennan F. Wall
62-A Oak Pond Avenue
Millbury, MA 01527

cc:' Millbury Board of Selectmen.

MBTA Advisory Committee to the Millbury Board of Selectmen

Mr. Andrew Brennan
Manager, Environmental Affairs, MBTA

Mr. James Eng
Project Manager, MBTA

Comment Letter No. 25

2125 B

TUFTS UNIVERSITY
School of Veterinary Medicine

Office of the Dean

February 24, 1995

RECEIVED
MAR 1 1995
MEPA

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Secretary Coxe,

I am writing in regard to the Draft Environmental Impact Report for the Worcester Commuter Rail Extension Project, EOEA No. 9154. I am strongly in favor of this project proceeding as planned by the MBTA. I am especially interested in seeing that the Grafton stop on this route be completed. (1)

This project is easy to support in that it has the good fortune to be both a benefit to the environment and to economic development in the region. It will benefit the environment by reducing solo car ridership along the east-west corridor serviced by this rail line. This reduced auto traffic will lessen both air pollution and traffic congestion, not a moment too soon given the imminent construction of the central artery tunnel.

This rail line and specifically its stop in Grafton will greatly benefit economic development in Central Massachusetts. You may be aware that Tufts University is developing a Biomedical Research and Development Park on its Veterinary School campus, which abuts the proposed train station in Grafton. Also, Worcester Business Development Corporation is developing Centech Park, a biotechnology manufacturing park also abutting the proposed Grafton train station. Tufts Veterinary School is the primary magnet drawing prospective companies, and their jobs, to each of these sites. The Grafton train stop will serve as an additional advantage to companies contemplating the location of their facilities in Central Massachusetts. This is true for two reasons. First, the train will provide a marvelous alternative to driving between the biotech parks in Grafton and the other concentration of biotech activity in Massachusetts, the Boston/Cambridge. Also, companies will see that prospective employees of the Grafton biotech parks can conveniently "reverse commute" from homes in eastern Massachusetts to work in central Mass, without having to commute solo in their cars.

Please reply to:
☒ Tufts University
School of Veterinary Medicine
200 Westboro Road
North Grafton, Massachusetts 01536-1895
508/839-5302

☐ Tufts University
School of Veterinary Medicine
203 Harrison Avenue
Boston, Massachusetts 02111-1840
617/956-7603

Comment Letter No. 25

Additionally, Tufts University has its medical campus on Harrison Avenue, near South Station in Boston. Many of my school's classes, faculty and students are located on that Boston campus. Having a Grafton train station would allow mass transit commuting in both directions by faculty, students and employees, instead of solo auto commuting that is now the norm.

Usually economic development projects involve difficult environmental tradeoffs. This Worcester Commuter Rail Extension Project promises to improve both economic development and the environment. I respectfully request that you approve the MBTA's Draft Environmental Impact Report. Thank you for providing this opportunity to comment.

Sincerely,

Franklin M. Loew, D.V.M., Ph.D.
Dean

FML/jjh

cc: William Purcell
Worcester Chamber of Commerce

Comment Letter No. 26

MEPA 3/9/95 NB

TOWN OF GRAFTON

GRAFTON MEMORIAL MUNICIPAL CENTER
30 PROVIDENCE ROAD
GRAFTON, MASSACHUSETTS 01519

BOARD OF SELECTMEN

RECEIVED
MAR 9 1995
MEPA

March 6, 1995

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Madame Secretary:

The Town of Grafton has reviewed the November 1994 Draft Environmental Impact Report for the Worcester Commuter Rail Extension Project (EOEA No. 9154), as well as written comment received. As you know, the comment period on the DEIR closes on March 9.

While earlier drafts of the EIR projected extremely low ridership from the Grafton (12) and other intermediate stations, the November 1994 DEIR seems to have quite realistic ridership projections for Grafton (50) and other communities.

The Grafton Board of Selectmen continues to support the Commuter Rail extension project (Framingham - Worcester), with a small (maximum 250-car) station in Grafton and without any Assessments.

There appear to be some minor inconsistencies in the number of parking spaces actually being planned for the Grafton station as described in this document. We assume that the MBTA is anticipating a maximum 250 car lot, recognizing that natural/design constraints may result in a somewhat lower capacity. The long term ridership projections seem fairly conservative; however it is difficult to anticipate whether societal changes (i.e. a much greater emphasis on public transportation) would increase the ridership from Grafton and other (Northbridge, Shrewsbury) communities.

Because of the intrinsic link to such Grafton issues as station size, parking lot design and impact on area (state and local), it will be important to build both the Westboro (regional-size) and Millbury (at whichever site is more appropriate and preferred by the community) stations.

The DEIR indicates that mitigation of the effects of blasting will be done. General soils maps show some shallow hardpan in this area, but do not detail ledge or boulders. The Final EIR should contain more information on this. (1)

Comment Letter No. 26

(2) Section 13.12 addresses mitigation at two intersections which both have a level of service (LOS) rating of "F." The Town should be involved in any discussion about possible mitigation measures. Obviously, we will be unable to support a program which could result in congestion and circulation problems. We have given a great deal of thought to the various -- and most appropriate -- mitigation measures for this troubled area because of this and other planning/development projects.

Overall, this DEIR seems to set the stage for a comprehensive evaluation of this important project. Following certification, we would expect the FEIR to address many of the more specific items only touched on in the DEIR.

Yours very truly,

Grafton Board of Selectmen

cc: Worcester Area Chamber of Commerce
Senator Matthew Amorello
Representative George Peterson
Citizens Advisory Committee
Mr. Scott Rossiter

Comment Letter No. 27

THE TOWN OF SOUTHBOROUGH

BOARD OF SELECTMEN

Town House, Box 9109, Southborough, MA 01772-9109 Tel: 508-485-0710 Fax: 508-480-0161

March 7, 1995

Secretary Trudy Coxe
Mass. Executive Office of Environmental Affairs
100 Cambridge St.- 20th Floor
Boston, MA 02202
Attn.: MEPA Unit

RECEIVED
MAR 1 1995
MEPA

Re: EOEA- #9154
DEIR- Worcester Commuter Rail Extension

Dear Secretary Coxe:

The Town of Southborough, based on a review conducted by its MBTA Study Group, submit the following comments on the Draft Environmental Impact Review submitted by the Mass. Bay Transportation Authority proposing the extension of commuter rail from Framingham to Worcester.

I. REGIONAL STATION

1. Chapter 17 is an inadequate analysis of the Regional Station option, because it presupposes that all local stations are built prior to the Regional Station. Their market share is then slightly redistributed when the Regional Station is built, resulting in low ridership and a "not cost feasible" determination. MBTA misses entirely the local viewpoint. We want a regional station ***instead*** of local stations. Do not build local stations by 1996, but rather put the Regional station on-line first, then smaller local stations if needed. Model may show Ashland, Southborough and Westborough would use a Regional station and therefore, local stations would not be cost feasible. (1)

2. Undoubtedly the ACEC status of Cedar Swamp presents a problem for citing a Regional Station, but positive, creative solutions may yet be found if ***really*** desired. The FEIR should continue to look at regional station options and not drop the topic as proposed in the DEIR. A conservative estimate of ridership totaling 1290 patrons boarding at I-495 cannot be ignored. This number is conservative because it was obtained by running the 28 community catchment area model as opposed to looking at additional riders coming from the south, north, and west along I-495 and Mass Pike to get to Boston. (2)

3

3. Southborough recommends that the MBTA redesign the Mass Turnpike/ I-495 site to resolve access and wetlands problems. Given the new "state control" orientation in Washington, it may be possible to get a waiver for site access directly off of a turnpike ramp or closer than one mile apart from existing exits. Much more attention is needed in this area.

II. FINANCIAL SCOPE

The DEIR fails to meet a component of the Secretary's scope. The MBTA refuses to address potential financial exposure for new station communities. Assessment issues have been an ongoing dispute between the communities and the MBTA during the ENF stage and then with your "Major and Complicated" CAC throughout the development of two DEIRs. Despite assessments: being scoped; the CAC revisiting the issue and voting it to be germane to their discussion; and the CAC providing a proposed work program for how to answer the assessment question; the MBTA still refuses to do more than cite the existing law. The CAC and the Town have decided we are at an impasse with the MBTA. The Secretary must decide whether to push this issue further in the FEIR. However, this action should not be interpreted as acquiescence by Southborough on this issue. Several communities have clearly stated they need assessment assurances or they will not accept a station. Failure to address the issue now will result in Southborough rejecting the station location due to perceived financial risk.

4

III. PARKING

5

1. Town desires to sign a legally binding agreement with the MBTA that stipulates that 420 spaces is the maximum number to be located at this site, unless the Town petitions the MBTA for an expansion.

6

2. Town wants to be on record as having interest in maintaining and policing north parking lot, in order to establish a "resident parking only" area. This will also help alleviate traffic problems along Southville Rd. by decreasing the number entering/exiting north lot.

IV. SEQUENCING /TIMING ISSUES

7

1. Town wants to be on record, that the now documented interrelationship among station sites requires that at a minimum Ashland, Southborough, and Westborough stations open simultaneously. F.E.I.R. should make a commitment to this schedule, or provide full disclosure of their station schedule and do full analysis of traffic, noise, etc. impacts for any station brought on line before the others. The host community should retain the right of refusal to bear these impacts albeit temporary.

8

Based on the findings in DEIR, the Secretary's special procedures memo should be amended. The Secretary previously stated stations could be segmented and the FEIR process done as each station is ready to come on board. The DEIR documented that this process will not work.

9

2. Numerous references are made to cost sharing with other agencies while this project is being completed, i.e. Conrail, EOTC and MHD. The F.E.I.R. should address the "certainty" of that funding being available to defray project costs and timing of its availability.

3. The cost estimates in the D.E.I.R. do not necessarily cover off-site mitigation such as sidewalks, traffic signals, intersection/roadway widenings and resurfacings. The F.E.I.R. should address what mitigation will be paid for with the $78 million budget and what will require other funding and from whom. It then should address again availability and timing of funding from other sources. **All mitigation must be completed prior to the opening of this station.** (10)

V. PEDESTRIAN ISSUES

1. It is the unanimous position of this Committee that there should not be a pedestrian overpass at this site. We remain committed to either of two options: (11)

A. Our first priority is to re-activate the existing underpass or build a new one. The old or new underpass must be well lit. (12)

B. An alternative is to install pedestrian gate system at-grade preventing commuters from crossing tracks when train is approaching/departing.

2. The FEIR should clearly state where sidewalks will be extended, width, curbing, etc. The Town wishes to reiterate our previously filed list of where we desire sidewalks. This list is attached to this comment letter. (13)

3. It has been agreed that sidewalks will be built in the proximity of, as well as on, the station site. This station has a high potential to service Hopkinton State Park. Thus, the sidewalks exiting onto Route 85 at the new access driveway should provide crosswalks to get park users on the right side of Route 85. These crosswalks may also need pedestrian lights to assist safe crossings during peak hours. (14)

4. Pedestrian activated traffic signals will be needed at Route 85/Southville Rd. intersection and crosswalks will be required to help people cross Southville Rd. to access the station and General Store. (15)

VI. TRAFFIC MITIGATION

1. The Town strongly disagrees with the supposition that traffic problems at the Route 85/Southville Rd. intersection can be remedied by merely re-timing existing traffic signal. Instead of arguing about this, we request that the MBTA petition MHD District 3 ***now*** to retime these lights, and then conduct additional, comparative analysis in the FEIR. Some modifications to the model will be needed to adjust for a temporary (18 months) decrease in traffic on Route 85 due to a bridge closing. (16)

2. Southborough does not agree with your projection that 50% of the Upton train riders already use Southborough as their route to the Mass Pike (p.15-11). To save time, Upton uses I-495 to the 11A entrance to Mass Pike. Traffic impacts resulting directly from the station should be adjusted upward in the FEIR. (17)

3. Southborough Study Group wants to be on record as supporting traffic mitigation at Route 85/30 intersection, assuming it can be achieved without forfeiting town character, This (18)

(18) scenic intersection defines Southborough, it is here as opposed to our Business Center, that artists depict Southborough. Thus modifications, although sorely needed, must be designed carefully.

4. The Town remains committed to closing the Cordaville Rd./River St. intersection to protect the neighborhood and decrease congestion at the North parking lot and General Store entrances. This may increase traffic flow at River and Southville, but this is where the problem should be handled on a State numbered road as opposed to a side street. Traffic signals should be altered to handle increased flow even if grading and drainage improvements are required. The MBTA is building the station and creating the impact. The traffic should be directed to a signalized intersection and away from a densely settled residential neighborhood. Hammond, Cottage and Parker Streets are approximately 10' to 12' wide. They should not be used as short cuts.

(19) 5. The Town offers a suggestion regarding LOS problems at the intersection of Route 85 and Southville Rd., especially if Cordaville Rd. is shut off at River St., as requested. It has been suggested that a right hand turn lane could be cut into existing vegetated triangle to decrease queue on Route 85 southbound. The FEIR should analyze this option in conjunction with the short leg of Cordaville Rd. being closed.

(20) 6. The DEIR measures traffic impact in terms of LOS decreases only. We believe intensity and ***duration*** of impacts are an issue. The DEIR clearly shows that our peak traffic hour will be extended by the station's peak generator hours in both morning and evenings. The timeframe nearly doubles in the evening and will be very disruptive in this rural residential area.

(21) 7. The access drive for the south parking lot must be better defined in the FEIR. We have concerns about both: (1) left turn of northbound a.m. traffic into lot and (2) left turn out of driveway due to bridge abutment obstructing views. FEIR should also address, as previously scoped, how the bridge widening will occur without impacting on historic character of the bridge. The bridge should remain granite and not a concrete retaining wall.

VII. BICYCLE ACCESS

(22) 1. We reiterate our request for all roadway improvements to create bike path lanes, particularly to extend our existing one from Richards Rd. to Hopkinton State Park or even Hopkinton Center. FEIR should explain in detail just what the MBTA plans are for improved bike access to their stations.

(23) 2. Site Plan in DEIR fails to address bike usage onsite or on train. We request bike lockers at this station.

VIII. NOISE

(24) 1. Town still wants Fitzgerald's Store and Ipanema Restaurant assessed for noise and vibration impact both during construction and normal train operations. They are the properties closest to this proposed train stop. We also want more detail in the FEIR about specific mitigation being offered in Southborough to residential and commercial properties.

Comment Letter No. 27

2. What are the speeds the train will be traveling as it traverses Southborough both with and without a station? (25)

3. There is not enough explanation in the DEIR to make noise impacts understandable to the average reader. The FEIR should clearly explain and elaborate on these noise impacts. Data should not be buried in the appendix which requires a level of expertise not possessed by the average reader from the impacted communities. FEIR should do this work for the reader in an easily understood manner. (26)

4. Residential neighbors that live on the hills overlooking the proposed station in Southborough and Hopkinton have expressed concern over how the noise analysis was done. First, noise impact should be calculated during both day and night time, because sound carries differently when there is less ambient noise in the evening. Second, noise rises and defuses as it rises. Yet the noise analysis is always taken at ground level. The Town requests that dBA analysis also be done in the neighborhoods on the hill during both morning and evening conditions. (27) (28)

IX. ADDITIONAL COMMENTS

1. Page 3-39 clearly states that Interim Service will not address Reverse Commuting or Weekend Service; then when DEIR discusses basic and expanded service it is silent on both topics:

> A. REVERSE COMMUTE- The schedules provide for it, and the chart clearly indicates that Southborough has 113 people who work in Worcester. However, no ridership or air quality credits are taken for all these outbound stops in the a.m. or inbound stops in the p.m. The FEIR must calculate feasibility and ridership for reverse commute. It must also recalculate cost and air quality benefits if in fact there is additional ridership. (29)
>
> B. WEEKEND SERVICE- Will there be weekend service as originally promised under Basic Service? If it has a station, Southborough definitely wants weekend service schedule. The Town has nearly 7,000 residents, but only 90 are projected to use the station to go to work. If the other 6,900 residents must put up with the inconveniences of a train station for regional benefits, they should at least be able to get to Boston or Worcester on the weekend. (30)

2. The MEPA Scope stipulated that station design should reflect "Village Business" character as articulated in our zoning. Thirty foot high light posts have never been allowed anywhere in Town, not even our Industrial Parks, let alone Village Districts. The maximum height is twenty feet. (31)

3. The work planned for this Extension should in no way preclude the electrification of this line. In fact, electrification should be a goal. (32)

(33) 4. The Town continues to request that since your plans require General Store to re-orient parking and store entrance to east side of lot, then the MBTA should provide that parking and new entrance. The FEIR should explain how this will be mitigated.

5. We are pleased that the MBTA continues to discuss recreation and landscaping projects for mill pond, river and stone arch bridge. However, the DEIR gives no more than a couple of sentences to this topic. We repeat that this is a town issue for Southborough and Hopkinton, and while we welcome Sudbury Valley Trustees comments, the site plan will be reviewed by appropriate local boards, e.g. Planning, Conservation and Open Space in both towns.

The Town will remain active on the "Major and Complicated" CAC and will continue to have its Study Group follow the process and meet with MBTA representatives. We expect that the FEIR will clarify what specific mitigation is to be offered, when and at whose expense. Until (34) these basic questions are addressed, Southborough cannot take a position on whether it will host a station.

Please keep the Town on all lists for MEPA communications. We hope that these comments prove helpful for scoping changes and more details into the FEIR.

Yours truly,

James W. Falconi

James W. Falconi, Chairman
Southborough Board of Selectmen

KB/jf
enc.

cc:	Southborough Board of Selectmen	Representative Barbara Gardner
	Southborough Planning Board	David Robbins, CAC Chairman
	Hopkinton Board of Selectmen	Metrowest Growth Management
	Hopkinton Planning Board	MAPC
	MBTA Study Group Members	Senator Robert Durand

Comment Letter No. 28

3/6/95 N3

WESTBOROUGH PUBLIC SCHOOLS

P.O. BOX 1152 - 45 WEST MAIN STREET, SUITE 301 - WESTBOROUGH, MASSACHUSETTS 01581 - 6152
TELEPHONE (508) 836-7700 FAX (508) 836-7704

March 1, 1995

Secretary
Executive Office of Environmental Affairs
20th Floor
100 Cambridge Street
Boston, MA 02202

RECEIVED
MAR 1995
MEPA

Attn: MEPA Unit

Dear Secretary:

This letter is written on behalf of the Westborough School Committee concerning the impact of the proposed M.B.T.A. station and parking lot at the Smith Valve site in Westborough. The Westborough School Committee voted unanimously at its public meetings of September 9, 1992 and February 8, 1995 to share our concerns with you.

The Westborough School Department currently operates two schools on Fisher Street, located within close proximity to the proposed M.B.T.A. site. The schools currently house 809 students in Grades 5-8. Of these students approximately 200 walk to school on a daily basis. We have 14 full-size busses and three vans transporting the other children to and from the schools.

The school department is presently preparing construction documents for additions to both schools. When the additions are completed in the fall of 1996, the combined enrollments will be 1157. Projections call for enrollments in these two schools to reach 1600 students by the 1998-99 school year.

We are concerned about the impact which the traffic heading to and from a M.B.T.A. parking lot will have on the safety of the children walking or being transported to and from the schools. One of the major roads leading to the schools, Maynard Street, is a very narrow street with no sidewalks. Maynard Street currently has a large automobile and truck traffic volume and is used as a shortcut to Route #9 by morning commuters. In addition to the students walking to these two schools, there are a number of students waiting to be bussed to their individual schools along many narrow streets leading to Fisher Street. Many of these students are of elementary school age, Kindergarten - Grade 4.

1

Comment Letter No. 28

In its previous letter to you dated September 18, 1992, the Westborough School Committee established some safety priorities and requested that you consider the following concerns:

(2) o *reduce the size of the lot from 600 to 300 cars;*

(3) o *improve the sidewalks and crosswalks in the location between the lot and the neighborhoods surrounding the schools;*

(4) o *provide funds to offset the cost of any additional crossing guards or bus routes which are deemed necessary to ensure the safe transportation of our children.*

The School Committee affirmed those recommendations at its February 8, 1995 meeting.

If you have any questions or need any additional data or information, please contact either Dr. John P. Doherty, Jr., Superintendent of Schools, or Mr. Les Olson, Assistant Superintendent for Administration and Finance. They may be reached at the Forbes Municipal Building, P.O. Box 1152, Westborough, MA. 01581. The telephone numbers are 508-836-7700 or 508-836-7702.

Sincerely,

3/1/95

Mrs. Lydia DaSilva
Chairperson
Westborough School Committee

D/sjl
cc: Mass Bay Transportation Authority
Westborough School Committee
Westborough Board of Selectmen
Westborough Finance Committee
Westborough Advisory Committee M.B.T.A.
Mrs. Judith McCabe
Mr. Glen Parker, Westborough Chief of Police

Comment Letter No. 29

TOWN OF WESTBOROUGH
MASSACHUSETTS

OFFICE OF THE PLANNING BOARD
TEL. (508) 366-3055

FORBES MUNICIPAL BUILDING
45 WEST MAIN STREET
WESTBOROUGH, MA 01581

February 21, 1995

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Ma. 02202

RECEIVED
MAR 7 1995
MEPA

Attention: MEPA Unit

Dear Ms. Coxe:

Upon review of the MBTA's Draft Environmental Impact Report (EOEA No. 9154) for the Worcester Commuter Rail Extension Project, the Westborough Planning Board can not endorse the proposed Smith Valve site for a local commuter rail station in Westborough. The Board, feels that there are inaccuracies and omissions in the reports information and that, therefore, the recommendations are inappropriate. (1)

We feel that some critical issues, including identifying potential access routes, were not adequately addressed. (2) The Board believes that local mitigation expenses will be significant and that the possibilities for construction of a regional station should receive substantially more consideration and investigation. (3)

Attached are our comments on the EIR. The Westborough Planning Board welcomes any comments or questions you may have regarding these. Please contact, Jim Robbins, the Town Planner at (508) 366-3055. We look forward to hearing from you and hope for a workable alternative for commuter rail serving our area.

Thank you.

Sincerely,

Richard Brady, Chairman
Westborough Planning Board

cc: MBTA
Westborough Citizens Advisory Committee
Board of Selectmen

Comment Letter No. 29

TOWN OF WESTBOROUGH
MASSACHUSETTS

OFFICE OF THE PLANNING BOARD
TEL. (508) 366-3055

FORBES MUNICIPAL BUILDING
45 WEST MAIN STREET
WESTBOROUGH, MA 01581

February 2, 1995

To: MBTA Advisory Committee

From: Jim Robbins, Westborough Town Planner

Re: Westborough Commuter Rail Site

Attached is a summary of my comments and concerns regarding the Worcester Commuter Rail Extension Project. These comments are based upon a review of the Draft Environmental Impact Report (EOEA No. 9154) dated November 1994 and the update on MBTA Proposal to the Board of Selectmen of 1/10/95 from the Westborough MBTA Advisory Committee.

Comment Letter No. 29

WESTBOROUGH PLANNING BOARD COMMENTS:

PROPOSED WORCESTER COMMUTER RAIL EXTENSION PROJECT: DRAFT ENVIRONMENTAL IMPACT REPORT (EOEA NO. 9154).

The following comments reflect concerns of the Westborough Planning Board. Some of the issues raised will require additional study by the MBTA to be adequately addressed.

Ridership Projections and Demand for Service:

The decision to provide a local and/or regional MBTA Commuter Rail Site is based upon a critical level of local or regional demand. The current ridership projections in the Draft EIR measure local demand in Westborough at 22 riders/day.

1. Initially, the Planning Board suspects this is a low estimate, given the increasing amount of residential development in Town. However, if this is an estimate acceptable to MBTA, the Town questions the MBTA's method of determining critical demand. Even with significantly more riders originating from surrounding towns (Northboro, Upton, Shrewsbury), how does this ridership justify locating a station in Westborough in light of potential local mitigation costs? How are the access issues for Westborough and surrounding user towns better addressed with a local station as compared to a regional station? (4) (5)

2. Current ridership projections for Westborough and surrounding user towns do not appear to account for present and future land use development. Over the course of the past year, the MBTA has not contacted the Planning Board to account for future local development plans. These plans will affect ridership. Local housing and commercial growth both generates and attracts trips. Given these factors, ridership estimates may be low. Furthermore, since development is also increasing in surrounding towns, estimates of incoming riders is probably also inaccurate. (6)

Local Development Projections:

Growth in housing (trip origins) and commercial development (employers, retailers: trip destinations) has real implications for ridership demand and projections.

Future development plans in Westborough along Rte. 9 (Walmart and a new shopping center proposal at the intersection of Rte 9 and Milk Street/Route 135) will impact the level of service provided at key intersections targeted along access routes to the Smith Valve Site. (7)

1. Though widening of Rte 9 is proposed adjacent to the Walmart site at Otis Street, this intersection is currently at a failed level of service. The proposed widening to offset the Walmart project does not account for the commuter rail station.

   Conversely, the level of service cited in the MBTA report does not appear to consider Walmart.

2. A new shopping center planned for Rte. 9 with direct access from Milk Street/Rte 135 will add commuter traffic on a primary access route for the rail station. This will be particularly critical during evening commuter hours.

3. Placing additional traffic on routes targeted as primary access to the rail station will force commuters to choose other routes. These alternate routes will likely be across local neighborhood streets.

Access:

Contrary to what the MBTA study projects, local travel patterns to the Smith Valve site are most likely to occur over residential neighborhood streets.

1. Given that the Otis Street/Rte 9 intersection is currently at failure and even with an improved turning lane onto Otis Street, commuter traffic is most likely to seek the shortest routes with least stopping time. (8)

   Traffic from Shrewsbury is likely to travel Walnut Street to Gleason Street. Northborough commuters can be expected to travel Rte 135/Milk Street to Maynard Street. Traffic from Upton and Westborough is likely across West Main, Mill Road and Fisher Street. Additional in-town traffic is likely across School Street, Milk Street, Maynard Street, and Fisher Street. (9)

2. Since the proposed station for the Town of Southborough will have parking constraints, Westborough will realize a large portion of Southborough ridership. (10)

3. The MBTA study overlooked the major possibility of commuter pass-through traffic across Maynard Street. Maynard Street is one of the most direct routes to the Smith Valve station. This is a country road. In its present state it is not capable of safely handling peak hour commuter traffic. The road width, site distances and lack of roadway shoulders will not be suitable for fast moving commuters. In addition, the street presently includes an old bridge which is not passable to 2-way traffic. (11)

4. The assumption that residential streets would only experience local traffic is naive at best. The EIR's statement that no "new" traffic would be generated on Fisher Street is very hard to believe in light of the travel pattern stated above. (12)

Level of Service:

Terminal time/head-way (waiting time for riders to load/unload at stations) and schedule consistency are key to the success of mass transit, particularly work ridership commuter rail. Convenience of commuter rail becomes less attractive with inconsistent schedules and/or delays.

1. Presently, the MBTA projects that the commute time from Worcester to Boston is 65-70 minutes, with no stops between Worcester and Framingham. The MBTA also projects that this travel time will remain unchanged even after the addition of five (5) local stops between Worcester and Framingham. How is this possible with a minimum terminal time of 2 to 3 minutes at each local stop? (13)

2. There is no provision for weekend service for the new stations. How does this train serve the local non-commuter residents, all of whom will be equally responsible for paying local service assessment fees. With a projected ridership of only 22 commuters per day in Westborough, how are the majority of local residents served? (14)

Mitigation:

The EIR states: "Traffic generated by the proposed commuter rail station will not cause any location within Westborough study area to deteriorate from acceptable level of service to an unacceptable level of service". (EIR Nov. 1994, Section 14.0, page 14-40).

Indications from local town officials lead us to believe that this may not be true. Certainly, if the local travel patterns have been misidentified the impact on local streets may also have been misevaluated or underestimated.

1. At the very least, Fisher Street will require upgrading including widening and possibly sidewalks. In addition, the development of a 120 unit apartment complex at Fisher Street and Gleason Street may generate walking traffic to the proposed station. This may also require sidewalks to protect public safety. (15)

16 2. There is the possibility of the need to upgrade local bridges presently on residential streets. This may be required as a result of demand for a higher level of service along access routes to the station.

17 3. Will the Town of Westborough be responsible for these possible mitigation costs?

Local Assessment:

The State Legislature usually charges a user-fee to communities within the MBTA service area. This fee, or assessment, is usually charged to the town on an annual basis. The fee is passed on to the local taxpayer. To date, Westborough has heard only rumors about the possibility of being charged a local assessment. The estimates for an assessment to the Town, based on the MBTA complicated formula, range from $300,000 - $400,000 annually. It has also been discussed that if Westborough would accept a station there would be no local assessment required of the Town.

18 1. What is the real likelihood of Westborough being charged an assessment?

19 2. What is a real estimate of such an assessment?

20 3. If the present ridership projections are realistic, how equitable would an assessment be to the taxpayers?

21 4. If the Town must pay for mitigation, would an assessment be equitable?

MBTA local assessment fees are real costs. Westborough must get real answers from the State Legislature regarding these costs.

Regional Station:

The MBTA study states that "no increase of ridership would be realized at a regional station over the combined local stations". (EIR, November 1994, Section 17, p. 17-2) However, the costs of mitigation and construction of several local stations may exceed those of a regional site.

1. Local public safety risks and costs have not been weighed or offset against the regional site.

2. Furthermore, the study states that if a Westborough station were not constructed in the short-term, the ridership from Westborough diverted to other local stations would not reduce total regional ridership. "Implementation of a regional station as a long-range goal in lieu of near term implementation of the Westborough station could be a viable alternative" (EIR, p. 17-3). If the regional station is a viable alternative, why hasn't there been further study on this alternative? (22)

3. Without a regional station, and with parking constraints at the Southborough location, Ashland will likely become a regional station (EIR, p. 17-4). This scenario places still further strain on local streets in Ashland. What are the local mitigation costs? (23)

RECOMMENDATIONS:

The MBTA should conduct further study of the feasibility of a regional site. It is possible that the Commonwealth as well as local towns could save real dollars in acquisition, construction and mitigation if a regional site was developed. (24)

Comment Letter No. 30

TOWN OF WESTBOROUGH
MASSACHUSETTS

BIRTHPLACE OF ELI WHITNEY

BOARD OF SELECTMEN

TOWN HALL
34 WEST MAIN STREET
WESTBOROUGH, MA 01581-1998
TEL. (508) 366-3030

March 6, 1995

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202
Attention: MEPA Unit

RECEIVED
MAR 7 1995
MEPA

RE: EOEA #9154 - DEIR Worcester Commuter Rail Extension

Dear Secretary Coxe:

The Westborough Board of Selectmen, with its MBTA Advisory Committee, has studied the issue of siting a local MBTA station in Westborough for approximately four years. From the input of residents on the proposed station at many public meetings and from numerous letters received (a sampling is included), the Board has determined that there is significant support for mass transit in Westborough, but mainly at a regional station located in the vicinity of the Massachusetts Turnpike and Route 495.

The Selectmen do not believe that this DEIR addresses the major concerns that the Town of Westborough has about the traffic generated, including the deterioration of level of service on Route 9-Otis Street and on local access routes. We are also concerned about safety and liability issues and the lack of mitigations. The Board believes that a station at Smith Valve Parkway will have substantial negative impact on the Town's roads and neighborhoods, yet no mitigation has been proposed by the MBTA. Noise and vibration abatements, road widening. sidewalks for school children, relocating utility lines, and the widening of railroad bridges must be addressed through mitigation proposals from the MBTA. (1) (2)

The Town Planning Board, Police Department, School Committee, Historical Commission, and MBTA Advisory Committee have gone on record to identify their concerns about the errors or omissions in the DEIR, particularly in ridership estimates. traffic impacts, and lack of mitigations.

In view of the response by Town Departments and many citizens, the Board of Selectmen has voted unanimously to endorse the building of a regional station near Rt. 495 and to support the undertaking and appraisal of a complete, serious feasibility study as approved in the Transportation Bond Bill, before any local stations are constructed. (3)

In addition, with the Town's present financial constraints and without any concrete information on the amount of any assessment to be charged to Westborough, the Board of Selectmen feels that we cannot "write a blank check" for the MBTA. Since the Special Commission to study the financing of the MBTA (Sec. 7, Chap. 60, 1994) has

Comment Letter No. 30

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yet to be established and has received a reporting extension, the Board has further reason to request an extension until the local assessments finally have been determined.

(4) We therefore request that EOEA request a project deadline extension for a regional station alternative as outlined and permitted the U Transit System Improvements (310 CMR 7.36), section 3: Project Delays and Project Deadline Extension.

The extension would apply to 310 CMR 7.36, section 2 (3c).

"Before December 1996 construction of the following facilities shall be complete and opened to full public use:

(3.) 10,000 Park and Ride and Commuter Rail Station parking spaces system-wide outside of the Boston core area as defined by a report to be submitted to the Department by EOTC which identifies the location, size and market area of each facility constructed to satisfy this requirement. Said report will be submitted three months prior to the deadline for this project."

Since the Framingham Commuter Rail line already has been extended to Worcester in compliance with the regulations, we are requesting an extension for a regional station that affects only the 2,000 or so parking spaces presently slated for stations in Westborough, Southborough, Ashland, Millbury, and possibly Grafton.

We suggest that the feasibility study weigh a regional station as compared to all five local stations in light of:

(5)
- total costs, including all local mitigation costs in the five towns hosting a local station
- additional ridership from Marlborough, Northborough, Shrewsbury, Upton, and Hopkinton, considering new residential and commercial growth
- traffic, safety and liability impacts of access routes on major highways vs. through local neighborhoods
- environmental impacts, including noise, vibration, liability and safety issues for regional and local stations, based on the five towns' comments to the DEIR

Respectfully submitted,

Kristina N. Allen

Kristina N. Allen, Vice Chairman
Board of Selectmen

cc
Secretary James J. Kerasiotes
Senator Robert Durand
Senator David Magnani
Representative Ronald Gauch
Citizens Advisory Committee

Comment Letter No. 31

Police Department
Westborough, Massachusetts

Glenn R. Parker
Police Chief
508-366-3060

RECEIVED
MAR
MEPA

February 27, 1995

Trudy Cox, Secretary of Environmental Affairs
100 Cambridge Street 20th Floor
Boston Ma. 02202

Dear Ms. Cox:

I have reviewed the DRAFT Environmental Impact Report (DEIR) for the proposed Worcester Commuter Rail Extension Project and feel as I stated in 1993, that a regional station located at Route 495 and the Massachusetts Turnpike would be the most logical and commonsense location for this project. Otherwise, I do not support a satellite station located in the Town of Westborough.

I base my opinion on the information or lack of same documented in the DEIR, my personal experience as a police officer in Westborough for twenty five-years and the statistical information obtained from public safety departments in the communities with an existing MBTA station. It is obvious that the MBTA will not mitigate any of the public safety concerns that the Town of Westborough has nor is the assessment cost of the project known to the community. The DEIR confirms my previous opinion that a commuter rail stop in Westborough will benefit only a very few (22 riders) and will adversely effect everyone else.

If the DEIR is accurate, than building a station for 22 riders makes no sense at all.. This proposal is a poor financial investment for the MBTA and an unnecessary expense for the taxpayers of Westborough. It will create resentment among the residents and an unnecessary hardship for the public safety departments of this community.

Respectfully,

Glenn R. Parker
Chief of Police

cc: Westborough MBTA Advisory Committee

Comment Letter No. 32

MEPA
1/19/95

Westborough Historical Commission
Westborough, Massachusetts 01581

RECEIVED
JAN 2 3 1995
MEPA

10 January 1995

Secretary Trudy Cox
Executive Office of Enviornmental Affairs
20th Floor
100 Cambridge Street
Boston, MA. 02202

Re: Worcester Commuter Rail Extension Project, EOEA 9154

Dear Secretary Cox:

Several inaccuracies exist in the D.E.I.R. of the project referenced above.

Table 7.8-1, page 7-73 errors exist in column, "Potential Eligibility":

11 Maynard Street is not listed as an historic property and it is eligible (1)

59 Fisher Street is not listed as an historic property and it is eligible (2)

73,79,99,138 & 143 Fisher Street (see attached) are documented in our Westborough Survey Forms and all potentially eligible (3)

Section 14.0 Page 14-1 Environmental Impacts-Westborough Station, Paragraph 5: our listings involve more than three residences which will be subject to "temporary construction noise impact" (4)

Section 14.6 Page 14-33 Historic Properties Sites: The statement that no architectural resources are located near the proposed Station is erroneous, see attached Survey Forms (5)

Section 14.7 Archàeological Resources: Our findings at sites:
Page 14-33 Charlestown Meadows, Hoccomocco, and Astra, all within proximity or adjacent to the Westborough MBTA Station have documented and substantiated the Middle and Archaic periods existing 3,000 to 8,000 years ago. We understand that "Timelines" has done a survey of these area impacted, however to date the report has not been made available to Massachusetts Historical Commission or our Commission.

(6)

Our Commission, therefore, once again comments that "construction impact" will occur to the above identified structures and sites.

Sincerely,

Jacqueline C. Tidman
Chairman

encl: (8)

cc: Judith B. McDonough
Executive Director, SHPO
Massachusetts Historical Commission

John J. Haley, Jr , General Manager
MBTA

Comment Letter No. 33

TOWN OF WESTBOROUGH
MASSACHUSETTS
01581

March 3, 1995

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202
Attention : MEPA Unit

RE: EOEA #9154 - DEIR Worcester Commuter Rail Extension

Dear Secretary Coxe:

The Westborough MBTA Committee submits for your consideration the following comments on the Draft Environmental Impact Report for the Worcester Extension of Commuter Rail - EOEA #9154: 1

GENERAL SUMMARY STATEMENT:

The Westborough MBTA Advisory Committee supports the goal of increasing public transportation alternatives for Central Massachusetts residents, including commuter rail service. The Committee believes, however, that this DEIR is inadequate because it fails to adequately address several major concerns to Westborough residents. These include:

- The Unresolved Issue of Potential Costs to Westborough through Local Assessments;
- The Failure to Address the Impacts of Planned Developments on Ridership;
- Unacknowledged Traffic and Pedestrian Safety Impacts on Local Residential Streets;
- The Failure to Address Abutters' Concerns Regarding Site Construction, Safety and Liability Issues;
- The Lack of a Proposed Mitigation Plan Containing Cost Estimates for Noise Abatement, Traffic Control, and Sidewalk Mitigation;
- An Inadequate Analysis of the I-495 Regional Station Option and Lack of a "True" Cost Comparison with the Smith Valve Station that Includes Off-Site Mitigation Costs;
- The Need for Completion of a Thorough Feasibility Study of the Regional Station and Settling a Site for a Regional Station Prior to the Construction of a Local Station.

The Westborough MBTA Advisory Committee agrees with the vote of the regional MEPA Citizen's Advisory Committee on October 25, 1994 : The 10 page "Regional Station Analysis" is inadequate and is not a substitute for a regional station feasibility study, as has been included in the recently enacted Transportation Bond Bill. The Committee requests that you direct the MBTA to complete this study as a requirement of the Certificate on the DEIR, prior to the construction of any of the 5 intermediate stations.

Comment Letter No. 33

I. LOCAL ASSESSMENTS

(2)

- The Westborough MBTA Advisory Committee disagrees with the MBTA's statements concerning the likelihood of legislative reform of the MBTA district and formula. (SECTION 6.0 SOCIO-ECONOMIC IMPACTS: 6.4 ASSESSMENTS, pgs. 6-7 - 6-10.) The Boston Globe reports that a legislative subcommittee of the Joint Transportation Committee has set an April 1995 deadline for developing a more equitable funding system.

  In accordance with this goal, a special state commission to examine MBTA financing was established earlier this year. Chaired by Senator Richard Tisei (R-Wakefield) and Representative Frank Hynes (D-Marshfield), the 13 member commission is comprised of two additional State Senators and Representatives, 6 municipal representatives (Franklin, Newton, North Reading, Norfolk, Malden and Stoneham), representatives from regional transit authorities (including Brockton and Haverhill), as well as State Transportation Secretary/MBTA Chairman James J. Kerasiotes and MBTA General Manager John J. Haley, Jr.

  This commission meets every three weeks and plans to hold public hearings. In the fall of this year, the commission plans to issue a report to the legislature containing recommendations for a more equitable funding system. If a report is issued in this time frame, the current MBTA formula and district could be altered by late 1996.

(3)

- The Westborough station, projected to be used by 22 Westborough riders out of a total ridership of 216 (Table 14.1-4, pg. 14-8), doesn't offer a great benefit to the town when weighed against potential costs through future MBTA assessments.

II. PROJECT COORDINATION WITH THE TOWN OF WESTBOROUGH

(4)

- The DEIR's statement that 'The (Westborough MBTA Advisory) Committee expressed a preference for the Smith Valve Parkway site" needs to be clarified. (SECTION 1.0 PROJECT OVERVIEW: HISTORY OF THE PROJECT, pg. 1-35).

  The Westborough MBTA Advisory Committee is charged to advise the Westborough Board of Selectmen, not the MBTA, and did not make the ultimate decision on preferred station location. The Westborough Board of Selectmen did not approve site selection at Smith Valve Parkway and has restated its position in support of a regional station somewhere in the vicinity of Interstate 495 and the Mass Pike. (This refers also to SECTION 11.5 CANDIDATE SITES -WESTBOROUGH Smith Valve Parkway pg. 11-12 "This site was selected by both the Westborough MBTA Advisory Committee and the MBTA.")

III. IMPACTS OF PLANNED LOCAL DEVELOPMENT

(5)

A major omission in the DEIR is a failure to address planned residential and commercial developments in the study area and their impacts on ridership projections and baseline traffic levels. Please refer also to the comments submitted from the Westborough Planning Board on this issue.

Comment Letter No. 33

III. IMPACTS OF PLANNED LOCAL DEVELOPMENT (cont.)

- Year 1996 " No Build" Traffic Volumes (Refer to Appendix 1, pg. 273)

  The Draft's statement that "Through discussions with the Town of Westborough, it was determined that no major new developments are planned within the study area by 1996" is incorrect and this information needs to be corrected and updated. The Westborough Town Planner reports that his office has not been contacted during the past 17 months regarding planned developments. (6)

- The 1996 "No Build" Traffic projections need to be revised to include several major projects are planned for the study area by 1996 : The 120 unit Charlestown Meadows apartment complex on Gleason Street, the Wal-Mart project at Otis Street north of Route 9, and the Assabet Estates home development which involves construction of a new road off Fisher Street near Otis Street. (7)

- Year 2001 "No Build" Traffic Volumes (Refer to Appendix 1, pgs. 308-309)

  The information concerning the proposed " Fountainhead Plaza " project is incorrect and out of date. Permits have been obtained for construction of a Wal-Mart at that location. This project is progressing and it is reasonable to expect that it would be completed by late 1996. The Wal-Mart project needs to be included in both the 2001 and 1996 "No Build" traffic projections. (8)

- The CTPS ridership projections for the Smith Valve Parkway station fail to account for future increases in ridership due to rapid residential growth in Shrewsbury, Northborough, and Upton - the communities projected to comprise 90 percent of station ridership. The MBTA should be required to consider the high growth potential and recent home building permits in these communities when forecasting ridership and impacts. (9)

- In addition, the MBTA needs to consider the likelihood that commuters will move to these communities based upon their proximity to commuter rail, where no such service existed before. (10)

  The Chairperson of this Committee has received calls from new Westborough residents and people looking to move to Westborough who are inquiring about the proposed station because Realtors told them the Town will be hosting one. It is therefore likely that demand and ridership will increase much more steeply, resulting in greater impacts than the DEIR projects.

IV. ENVIRONMENTAL IMPACTS - WESTBOROUGH

A. LOCAL TRAFFIC - SECTION 14.1:

- The DEIR states that "Riders from Northboro were assigned to Route 9 westbound to Otis Street." and "Riders from Shrewsbury would use Route 9 eastbound to Otis Street and Route 20 to Walnut Street to Gleason Street."(Refer to pg. 14-10 and pg. 14-11 Figure 14.1-4)

  Traffic projections need to be revised to acknowledge the use of local roads as preferred routes over Route 9 to Otis Street. The MBTA's projections that Maynard and Fisher Streets will receive only 2.8 % of the traffic to the Westborough station are in error. (11)

IV. ENVIRONMENTAL IMPACTS - WESTBOROUGH (cont.)

Taking the Route 135E to Maynard/Fisher approach from Northborough is both shorter and less traveled than the Route 9 to Otis Street approach. Most Northborough riders would use the quicker "shortcut" through these narrow winding roads to avoid delays at two sets of lights on Route 9 to reach Otis Street. The same hold true for Shrewsbury riders using Gleason Street to Smith Valve over Route 9-Otis Street.

12 • The MBTA's traffic study fails to include numbers for the Maynard/Milk Street (Rte 135) intersection. The DEIR should address this intersection and proposals for traffic control should be stated in an amended report.

13 • Arch Street is a direct access route to the proposed station. The traffic study fails to assign any station related traffic to Arch Street. The DEIR does not acknowledge the high potential for traffic and pedestrian safety impacts on this narrow, winding road.

14 • The DEIR's assertion that the Build analysis is a "worst case" analysis is not valid if riders use local roads (Arch, Mill, Maynard, School, Fisher, etc.) to reach the station instead of Route 9. The vehicles traveling to the station on local roads will not be double counted because they are new trips: They would not otherwise be using these residential roads in the absence of a station. Furthermore, 90 percent are projected to come from outside Westborough so they are not likely to be current users of these streets.

B. PEDESTRIAN TRAFFIC AND SAFETY- SECTION 14.11:

• The CTPS projections forecasting that no rail patrons will walk to the Westborough station are incorrect because they are based upon inaccurate and incomplete information.(pg. 14-39)

15 The nearby Fountainhead apartment complex, the 120 unit Charlestown Meadows apartment complex approved for construction on Gleason Street, and ongoing residential construction in the vicinity will provide a source of rail patrons walking to the station. The Office of the Westborough Planning Board can provide the necessary information, but the MBTA has neglected to contact them.

16 • The Westborough MBTA Advisory Committee believes sidewalk mitigation is required for the streets where students must walk to the Fisher Street schools.

The recent pedestrian vehicular fatality on Fisher Street (10/12/94) underscores the importance of and necessity for mitigation in the form of sidewalks and traffic control from the entire portion of roads beginning at the Maynard Street/Route 135 intersection, continuing on Maynard Street and Fisher Street, and then onto Otis Street and Smith Valve Parkway.

The station will attract pedestrians to an area they previously had no reason to frequent. The routes that these riders will walk do not have sidewalks. These pedestrians and others, including children walking to the Fisher Street Schools, will be placed at increased risk by station bound traffic.

Comment Letter No. 33

IV. ENVIRONMENTAL IMPACTS - WESTBOROUGH (cont.)

C. NOISE AND VIBRATION-SECTION 14.3, SECTION 7.3:

- There is not enough explanation in the DEIR to make noise impacts understandable to the average reader. The MBTA should clearly explain and elaborate on these noise impacts and present the data currently buried in the appendix in a form easily understood by a layperson. (17)

- The DEIR is severely lacking in its approach to noise and vibration abatement. A comprehensive noise and vibration abatement plan is required now, and the sources of funding for such abatement, if any, must be made clear. (18)

- Why are no residences considered impacted under basic service as 19 additional trains will be running? The Westborough MBTA Advisory Committee is skeptical of the DEIR's claim that the increase from 19 trains to 31 will cause 32 homes to be impacted, whereas the first 19 trains will cause no residences to be impacted. (19)

- The DEIR states that "The MBTA has recently adopted the policy of expending up to 2 percent of project construction costs for noise and vibration mitigation, but only when there is a clear benefit from the mitigation cost incurred". Based upon the 78 million construction budget, this provides up to 1.56 million for noise and vibration mitigation. However, the MBTA cost estimates (pg. 7-83) state that "The total length of noise barriers required to mitigate noise impact is estimated to be 1,200 linear feet for basic service and 16,950 linear feet for expanded service at estimated costs of $384,000 and 5,424,000, respectively".

  The conclusion that basic service does not cause noise impacts requiring mitigation merely allows the MBTA to delay addressing the need for implementing costly noise mitigation. One reason why the MBTA might claim that noise and vibration impacts from basic service will not require mitigation in Westborough could be a lack of available funding.

  The Westborough MBTA Advisory Committee believes noise barriers are required for basic service, regardless of whether a station is constructed at Smith Valve Parkway. This requirement for noise barriers and the sources for their funding need to be addressed before basic service comes on line. (20)

- Under expanded service, Table 3.4-6 (pg. 3-45) states that there will be 31 trains stopping in Westborough running as late as 1:20 AM. This will add a significant level of noise, even if the commuter trains are quieter than the freight trains. (21)

- Per table 7.3-2 (pg. 7-17), which homes are considered impacted under expanded service? The locations of these residences should be listed in the DEIR. (22)

- Per table 7.3-3, where are the potential noise barriers of 5650 feet to be located in Westborough under expanded service? (23)

- The suggestion of "sealing holes in exterior surfaces that might admit sound and by providing forced ventilation and air conditioning so that windows do not need to be opened"(pg. 7-20) is not acceptable as form of mitigation. (24)

- How will the noise level change for local residents with no Smith Valve station and only a I-495 station (i.e. faster train speeds if not stopping at Smith Valve parkway)? An accelerating train requires 1 to 1.5 miles to reach full speed from a stop. The accelerating train is noisier than one passing by at full speed. (25)

Comment Letter No. 33

IV. ENVIRONMENTAL IMPACTS - WESTBOROUGH (cont.)

D. AIR QUALITY -SECTION 14.2 (pg. 14-26)

(26) Air quality tests should be performed for residences and near the Fisher Street schools because the Maynard Street/ Fisher Street/Mill Road area will experience traffic impacts due to vehicles using these roads as shortcuts to reach the Smith Valve station.

E. TRACK SAFETY CONCERNS:

The DEIR fails to address any mitigation for the most exposed sections of track in Westborough, namely the section of track crossing Water Street and High Street where these two roads intersect. The track in this area is open and accessible and a stone/dirt parking area abuts the track at one point. Residents park their cars in this area and at present a pop-up camper is parked next to the tracks. A large number of school aged children live (27) in this densely populated area of town, and a trip to this area on a sunny afternoon will show that these children do play in close proximity to the tracks.

An increase in the volume of rail use caused by an expanded MBTA schedule will increase the likelihood that accidents could occur at this section of track. The MBTA should install a sight appealing fence around this 100-200 foot stretch of track to limit access and ensure the safety of residents in the area.

F. STATION DESIGN AND CONSTRUCTION ISSUES:

Abutters to the Smith Valve Parkway site on Fisher Street have expressed the following concerns to the Westborough MBTA Advisory Committee regarding the feasibility of the MBTA's site construction plans:

- (28) The station platform as proposed would be within 1 to 2 feet of the property lines of homeowners on the south side of the station tracks. The tracks are elevated up to 15 feet above 99 and 101 Fisher Street. The DEIR has not addressed how to construct the 800 foot platform, which is over 21 feet from the track center, without filling or grading on these properties. This would preclude station construction without access to these properties.

- (29) Limited land availability would prohibit landscaping, sound barriers or other station improvements without encroaching upon abutting property (refer to Figure 3.2-3 pg. 3-17). Abutters are skeptical of the MBTA's claims that no property taking is required for station construction and question whether the necessary sound barriers and landscaping can be developed on the limited rail property available on the south side of the tracks.

- (30) The New England Power Company has an easement along a 70 foot wide section of 99 Fisher Street. This easement prohibits the construction of fences and allows the New England Power Company to cut back trees and other plant growth. The easement is in direct conflict with abutters' desire for sound abatement measures. The DEIR fails to even address the existence of the power lines. These power lines must be relocated to the north side of the tracks to allow for proper noise abatement and pleasurable landscaping on the south side of the tracks.

IV. ENVIRONMENTAL IMPACTS - WESTBOROUGH (cont.)

G. SAFETY AND SECURITY AT THE STATION:

The DEIR fails to address several safety issues for commuters at the station:

- Power lines adjacent to the station emit RF radiation. ANSI standard C95.1-1991 addresses the allowable RF radiation limits. The DEIR should provide RF measurements to assess the impact on passenger safety and determine if RF safety limits would be exceeded. (31)
- The location of the pedestrian bridge adjacent to high power transmission lines must also be addressed from both possible electrocution dangers and RF radiation hazards. (32)
- The DEIR fails to mention any plan to restrict pedestrians from crossing abutters' property or from walking or falling off the station platform onto abutters' property. The DEIR refers to a "covered canopy about 150 feet in length"(pg. 3-17) that will prevent pedestrians from walking or falling off the platform. It is not clear whether the remaining 650 feet will have safeguards to protect passengers. With the station platform up to 15 feet above the adjacent property, severe injury could result. The issue of the abutters' liability in case of an accident must be addressed. (33)
- The DEIR does not address station security issues. Abutters have expressed concerns about the potential for problems given the remoteness of the site. This issue must be addressed by the MBTA in coordination with the Westborough Police Department. (34)

V. MITIGATION ISSUES

A. MBTA MITIGATION POLICY:

The MBTA's mitigation policy needs to be revised to acknowledge that "breaking it" refers to the duration and frequency of impacts (i.e. increased traffic and noise) and not merely the change in an intersection's Level of Service. For instance, the Peak Generator Hour for station bound traffic will extend the Peak Traffic Hour in both the morning and evening. Also, residents have expressed concerns regarding the increased frequency of commuter trains in addition to the noise impacts from each train. (35)

B. MITIGATION COSTS:

The DEIR does not address the costs of required off-site mitigation and how such mitigation will be funded with the 78 million project budget. The MBTA needs to address this issue now. Cost estimates for mitigation will better show the true costs of constructing the Smith Valve Parkway station and provide a more accurate cost comparison with the regional station option. (36)

C. PROPOSED MITIGATION- SECTION 14.13:

The DEIR states that "The MBTA plans to extend sidewalks beyond the proposed Westborough station" and "The MBTA will work with town officials to identify the exact lengths and locations".

V. MITIGATION ISSUES (cont.)

(37) Given the impacts to noise, traffic and pedestrian safety on local roads, the lack of specific mitigation proposals in the form of sidewalks, traffic control and noise abatement is unacceptable to the Town of Westborough.

The MBTA has not been communicating with the Board of Selectmen and the Planning Board. The concerns expressed by Westborough residents and officials are not new : The town has been reiterating the same concerns for over 3 years, through public meetings and comments made on the 1992 ENF and withdrawn 1993 DEIR : This DEIR has done nothing to address those concerns. The MBTA needs to commit to specific mitigation proposals and demonstrate that funding for off-site mitigation has been secured.

VI. REGIONAL STATION ANALYSIS

A. GENERAL COMMENTS:

(38) • The 10 page "Regional Station Analysis" is inadequate and fails to address the issues described in the scope. The Westborough MBTA Advisory Committee does NOT consider this chapter to be a "Feasibility Study" of the regional station and the MBTA should in no way be allowed to claim it substitutes for a thorough feasibility study, as has been included in the recently enacted Transportation Bond Bill.

(39) • The DEIR fails to provide a cost comparison of the 5 intermediate stations with the I-495 regional station that includes the total costs of off-site mitigation for the intermediate stations. This cost comparison should be scoped in the regional station feasibility study that has been included in the recently enacted Transportation Bond Bill.

Westborough's Town Planner comments that "It is possible that the Commonwealth as well as local towns could save real dollars in acquisition, construction and mitigation if a regional site was developed".

(40) • There is no logical reason why Westborough or Southborough should be rushed into a decision on a station location by the MBTA before a regional station alternative has been thoroughly studied. A regional station would ultimately provide a wider pool of riders than either station alone, without the negative impacts to traffic and pedestrian safety in our local neighborhoods.

(41) • The I-495 regional station is an opportunity to create a more viable cost effective rail system benefiting not only Central Massachusetts, but providing access from the western part of the state via the Mass Pike.

• "A recent MBTA number plate survey in the parking lots of its Framingham terminus and and other stations within the I-495 belt confirms that a significant patronage from Central Massachusetts exists already. The demand can only increase with a Worcester Boarding option." - TELEGRAM & GAZETTE, September 15, 1994- An I-495 Regional Station.

B. REGIONAL STATION SITES:

The DEIR states that "While a regional station is still a long term goal, the MBTA decided to concentrate efforts on extension of service to Worcester and leave the detailed planning for a regional station for another project to be scheduled at a future date." (SECTION 11.5 Candidate Sites-Westborough pg. 11-11)

VI. REGIONAL STATION ANALYSIS (cont.)

The Westborough Board of Selectmen, Southborough Board of Selectmen, regional MEPA Citizen's Advisory Committee, Westborough-Northborough Area Chamber of Commerce and the Westborough MBTA Advisory Committee all strongly support the undertaking of a thorough feasibility study of an I-495 regional station that has been included in the recently enacted Transportation Bond Bill. This study needs to be conducted now and the site for a regional station settled - prior to the construction of a local station in Westborough. (42)

C. IMPACT OF A REGIONAL STATION ON RIDERSHIP-SECTION 17.2:

- The DEIR's analysis of regional station ridership is flawed because it presupposes that all 5 intermediate stations will be constructed prior to the opening of a regional station. This assumes that intermediate station ridership will merely be redistributed and this flawed analysis results in a "not cost feasible" determination for building a regional station. (43)

- Other important factors have not been considered when forecasting regional station ridership:

  1. The CTPS projection of 1290 riders for a regional station alone is low because it fails to account for additional ridership from commuters already traveling on I-495 and or the Mass Pike whose destination is Boston. (44)

  2. The CTPS projections fail to account for the high growth potential and recent home building permits in the I-495 corridor. Unlike the communities along the 128 corridor, the I-495 region boasts the availability of land for home building and more affordable home prices. These factors combine to make the I-495 region in the vicinity of a proposed regional station an attractive place for Boston bound commuters to live. (45)

- The DEIR states that "No specific ridership estimates were prepared for an alternative in which a regional station and all other intermediate stations except Westborough were constructed." (pg. 17-3)

  The Westborough MBTA Advisory Committee had requested ridership projections without Southborough and Westborough local stations. The MBTA has told the Committee that it has the capabilities now to develop this scenario as well as excluding and including any or all of the intermediate stations. These projections need to be included in the DEIR. (46)

The Westborough MBTA Advisory Committee hopes that its comments will be helpful in evaluating the DEIR on the Worcester Extension of Commuter Rail - EOEA #9154.

Sincerely,

Joyce T. Coll

Joyce T. Coll, Chairperson
Westborough MBTA Advisory
Committee

Comment Letter No. 34

People for the Ashland West Alternative
Ashland Fish & Game Club
Ponderosa Road
Ashland, Ma. 01721

NB

February 17, 1995

Secretary Trudy Cox
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge St.
Boston, Ma. 02202

RECEIVED
MAR 8 1995
MEPA

RE: EOEA # 9154 Worcester Commuter Rail Extension.

Dear Secretary Cox,

Enclosed is a document that I am submitting to your citizens comment file. For identification purposes, please refer to this document as "People for the Ashland West Alternative (Ref # 0100). Our people are looking forward to working with you. Please contact me at the above address.

Thank you,

John J. Kelly
Vise President

Comment Letter No. 34

People for the Ashland West Alternative (Ref # 0100)

1

We, the undersigned concerned citizens, local business owners and/or abutters, are writing to express our opinion that the so-called west alternative site should be selected by the MBTA as the location for the Ashland Commuter Rail Station.

Although we are aware that a number of arguments in favor of the east alternative site have been advanced, it is our position that there are more compelling reasons for the selection of the west alternative. Outlined below are several points which we think support our position.

I. Quality of life/Safety
   A. Reduced impact of traffic and noise on residential areas, particularly elderly housing.
   B. Railroad grade crossings are likely to be blocked for a shorter period of time.
   C. The west alternative site is further removed from the Nyanza toxic waste site thus mitigating Nyanza's negative image

II. Economic/Quality of life
   A. The relocation of a historically and architecturally significant bridge has already been funded. The bridge will be placed across the Sudbury River at a point slightly east of the west alternative.
      1. The bridge will provide pedestrian access to approximately 32 acres of privately owned recreational land and associated facilities that are available to the public.
         a. The recreational facilities have a strong potential as a site for various community based activities as well as privately run functions that will be economically beneficial to the owners of the facilities.
   B. The construction of an access road between Rte. 135 and the west alternative site will encourage the development of industrial zoned land.

III. Environmental
   A. The west alternative site would avoid the probable delays and restraints of EPA operable units 2 and 3 phased cleanup of the Nyanza toxic waste site.
   B. Redesign of the west alternative site would minimize wetlands and floodplain issues.
      1. An independent environmental study should be commissioned
   C. Pending lawsuits between the EPA and current land owners at the Nyanza toxic waste site remain unresolved.
      1. Mitigation between the EPA and the MBTA is not likely to resolve these pending lawsuits.

In closing, we would like to point out that should the MBTA select the west alternative, it can expect to encounter minimal opposition from property owners and/or abutters. Indeed, the majority of us welcome the location of a commuter rail station and the economic and social benefits that derive therefrom. Please be assured that we are prepared to cooperate with and assist the MBTA relative to the selection and, hopefully, the construction of a commuter rail station at the west alternative site. We thank you in advance for your consideration and cooperation.

Comment Letter No. 35

Town of Ashland, Massachusetts

101 Main Street, 01721-1191

Fax (508) 881-0102

NB

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MAR 9 1995
MEPA

6 March 1995

Ref#560

Mr. Rocco Mancini
MBTA, Office of Construction
Transportation Building
10 Park Plaza
Boston, MA 02116

Re: EOEA #9154

Dear Mr. Mancini:

A series of recent actions by the MBTA have caused the Ashland Board of Selectmen to re-examine its decision to support the siting of a commuter rail station in the Town. Recent steps indicate that the Ashland West Alternative is being eased out of consideration by the MBTA, and that the East Alternative is being changed in ways which are contrary to the best interest of the Town. An utter lack of communication by the MBTA with the Town and with affected property owners has exacerbated the problem.

Although the Draft Environmental Impact Report (DEIR) on the project is still in process, the Town recently received plans (to the 30% completion stage) on the East Alternative. No advanced plan has been circulated for the West Alternative, calling into question the intent of the MBTA to give both sites equal weight in the review and selection process. The Town plans to arrange for a wetlands assessment of both the East and West Alternatives to provide an analysis independent of the one coordinated by the MBTA through Edwards and Kelcey.

The East Alternative plan would devastate the businesses which now line Megunko Road in one of the Town's few industrial zones. This is unacceptable. The design also leads us to believe that the MBTA is planning to abandon one of the Town's mandatory components for the plan: a direct access road from the station site to Route 135. The lack of any effort by the MBTA to make any contact with the EPA to coordinate and develop that aspect of the plan reinforces that belief. The Town is not willing to bear the flow of commuter rail traffic through the center of Town, past Stone Park, with its playgrounds and ballfields, or the elderly housing complex opposite the corner of Cherry Street and Megunko Road.

1
2

Comment Letter No. 35

6 March 1995 Ref#560
Mr. Rocco Mancini
MBTA, Office of Construction
page 2

(3) The Town must be a part of the decision-making process so that issues such as those expressed here can be resolved cooperatively rather than reactively. It would be in the best interest of the MBTA to schedule, at an early date, a public meeting in Ashland so that the MBTA can d iscuss current developments with this Board, affected businesses and property owners, and residents of the Town.

It is imperative that the MBTA increase its communications effort with the Town in the site development process or risk jeopardizing this Town's support and cooperative efforts with this project.

Ashland requests that the MBTA grant a two (2) week extension to MEPA, in order for more dialogue to occur between the MBTA and the Town. This would also allow the West Alternative to be more fully explored.

Sincerely, We will work with you to arrange a meeting in the month of March.

Ashland Board of Selectmen

Teresa M. Evans, Chairman

Gary A. Ghilani, Vice Chairman

David F. Teller, Clerk

Barry M. Bresnick

Shaun R. Finnegan

telephone (508) 881-0100

cc: Ms. Trudy Coxe, Secretary, EOEA (Re: EOEA #9154)

Comment Letter No. 36

Town of Ashland, Massachusetts

Comments on
Draft Environmental Impact Report (DEIR)
EOEA # 9154

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Ashland MBTA Rail Committee

Ashland appreciates the opportunity to participate in the process for extending commuter rail to central Massachusetts. Our town has been actively involved from the earliest phases of this project and is committed to successful involvement with this project.

General Comments

Regional Ridership Burden-sharing

- Ashland's goal is to service Ashland's residents and business community. Moreover, we recognize the need to carry some of the burden of providing rail service for neighboring communities. Our position from the start of the EIR process has been one of balanced burden sharing. We have worked closely with MBTA during the course of this project -- continually seeking the most realistic projections and candid description of how rail service would affect Ashland.

  From our knowledge of local and regional commuter rail issues we have been concerned that Ashland might be looked upon to provide more than its share of the burden for rail services. These concerns have been validated in the most recent DEIR. Although we maintain this concern, we do appreciate the direct and authoritative manner in which the reality is described in the DEIR. Specifically, page 17-3 of the DEIR indicates " ....Ashland would more realistically become ..... the defacto regional station.". This is an unacceptable situation for Ashland.

  Failure of a site to be located in Southboro would negate any interest on Ashland's part for accepting a station. Furthermore, an Ashland station must come on-line no sooner than a Southboro station.

Demand Projections for Rail Ridership

- The Central Transportation Projection staff's updated projection of ridership demand is now based on 1990 census data. One weakness which we believe exists is that of perhaps under projecting demand from Holliston. Our community's knowledge of recent, rapid, building activities in Holliston suggest that ridership may increase more steeply than the projections indicate.

  We request this be reviewed specifically with Holliston planning department staff and consider building permit trends for the most current 36 months with an updated or confirmed forward projection.

Financial Issues

- As the Secretary has deemed it to be within the scope of the EIR process and the special procedure, financial analysis of the rail extension is considered. Under the present guidelines and revenue / cost projections, Ashland assessment would increase nominally with the inception of rail service. Ashland is the only community on the Worcester extension being assessed. All communities directly affected through the Worcester rail service extension will, under the present formula, receive service but will not be assessed for that service.

  Ashland requests that equity be established for the communities west of our town. That is, if commuter rail service is offered to those towns west of Ashland, we request that the assessment of cost be allocated among those towns. In addition, as consideration for siting a station within it's borders, Ashland requests that the MBTA return the parcel of land which was previously utilized for rail services in our downtown back to Ashland.

Noise and Vibration Issues

- We have specific concerns with the analysis of noise / vibration and wish to see further clarification of the mitigation for these impacts.

  We request the MBTA, by it's generation of an approximately 100% increase in Ashland's rail crossings provide, in close coordination with Conrail, relief from locomotive horn blasts by installing a stationary horn for rail crossing warnings.

Site Specific Comments

Ashland West Alternative

- The DEIR and MBTA acknowledge the existence of floodplain, wetlands and sensitive areas on the proposed western alternative site. Thus this location may in fact be infeasible due to floodplain and wetlands. We believe a site redesign may potentially avoid wetlands and EPA involvement. (1)

  We suggest breaking the proposed south lot up into parcels (much like the west Natick MBTA lot). In addition, we request a reevaluation of the proposed 200 parking spaces on the north side of the tracks.

- Under the west siting alternative, there would be fewer impacts on industrial businesses.
- There would be no impact on EPA operable unit 2 and operable unit 3 phase cleanup
- 200 spaces on North side of tracks is not sufficient capacity. Parking spillover is likely. Thus, Ashland would resort to restricted on-street parking between certain hours and implement a "tag and tow" policy for controlling any parking lot spillover.
- North lot maximum tax revenue loss to Ashland approximates $29,000. The maximum South lot tax revenue loss is $5,000.
- Sidewalks would be required, particularly for access across the Cordaville Rd./ Pleasant St. bridge and as appropriate elsewhere. The junction of Cordaville Rd. and Pleasant St. is also a problematic and potentially unsafe access point for concentrated traffic volumes into the proposed parking lot. What mitigatigation does MBTA propose to alleviate this? (2)

Comment Letter No. 37

MAR-09-1995 10:38 FROM

MAR 09 '95 10:31AM

NB

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MAR 9 1995
MEPA

March 8, 1995
The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, MA 02202

Attn: Nancy Baker, MEPA Unit

Re: Draft Environmental Impact Report, EOEA #9154

Dear Secretary COXE:

I am enclosing the following comments regarding the Draft Environment Impact Report, EOEA #9154 on the Worcester Commuter Rail Extension Project. Some of these comments have been previously expressed by the Citizens Advisory Committee, Metro West Growth Management Committee, Ashland Board of Selectmen and its rail committee, and the Metropolitan Area Planning Council. I will try to minimize duplication except where it is necessary to emphasize a strategic point.

Before going into the details of my comments on the two volume EIR, I would like to discuss the overall framework regarding the Commuter Rail Extension. It is my firm belief that for a community to be "sustainable" in the State of Massachusettses, there are several key components for improved quality of life and environmental setting.

One, there is a need to make our towns, villages, and cities "holistic" in the sense that they have the ability to maintain a "sense of place" and community.

Two, The patterns of settlement need to investigated sprawl development and the reliance on automobiles are limited in the sense that the number of trips are reduce. It is obvious that one can not totally eliminate the use of automobiles in today's society, but one can minimize automobile usage to a more beneficial level for all concerned.

The Commuter rail extension offers an alternative tool to minimize sprawl which is offered in other parts of the country such as metropolitan Chicago, Portland, San Francisco and other places outside this country such as metropolitan Toronto, Paris, London, Stockholm, and an area in Holland.

We need to offer choices in transportation modes, hopefully with the right equipment and attitudinal changes, adverse air quality levels will be reduced, traffic congestion will be mitigated, resulting in communities that are re-invigorated at a more pedestrian scale.

Next, "sustainable communities" as previously noted are not sprawl development scattered about the landscape. Is this project going to improve the current situation in the Commonwealth or is it going to create further sprawl. The problem, as I see it, in this report, is that the stations are generally located in isolated locations that can be described as "pure park and ride stops". There are three possible exceptions to this comment, the Worcester, Ashland, and Southborough stops. If one is to build pure park and ride stations, then we are driving automobiles to large parking lots and not improving the fabric of these communities. (1)

What is even more distressing is that the location of these stops such as Millbury and Westboro which are prime examples of improper sitings. In these isolated locations such as Westboro is difficult to determine who is going to be utilizing said station. (2) In the Millbury example, it is also difficult to determine as to why commuters west of Worcester would opt for the station as opposed to going and staying on the Turnpike. (3) In addition, at the present time, the Mass. Turnpike has a number of "park and ride" lots including a site in Auburn near there interchanges. (4)

Next, the report does not go beyond its current role in the construction of the station and does not comprehensively examine existing and future land usage in the vicinity. (5) Nor does it go into to much detail over intermodal set-up, preferring to concentrate on the "park and ride" setups. (6) There are good examples of regions investigating land usage and mix of land use such as Metropolitan Toronto with its commuter rail, street cars, buses, and subway systems along with Metropolitan Chicago. (See attachments) Why isn't the MBTA taking the lead in promoting such land use and transportation improvements such as METRA in Chicago and Go Transit in Toronto. [Sources: Ministry of Transportation and Ministry of Municipal Affairs, Province of Ontario, Transit-Supportive Land Use Planning Guidelines, April 1992; City of Scarborough, Ontario, Canada, The Stouffville Go Corridor: Station Location Opportunity Study, July 1991; and Northeastern Illinois Planning Commission and METRA, Land use in Commuter Rail Station Areas: Analysis and Final Report and Land Use in Commuter Rail Station Areas: Guidelines for Communities, November 1991.]

Other overall questions include the status of the regional station at I-495 and the Mass Pike. The report glosses over this issue because of time constraints and costs, if the true need is to get cars off the highways then said automobiles should be taking off the roads at the earliest point as possible. (7)

Next, there is little comment on the connectivity with the State Parks at the proposed Ashland and Southboro stops. These two State Parks are in close proximity to this system and are important activity centers for the State. In other words, reverse commutes could be considered in more depth than as currently depicted in this report. (8)

Also, the issue of air quality in relation to electric cars needs to be explained in more detail. Will said electric cars reduce air pollution and will the matter congestion and parking remain?

Now the specifics of this report. I have skipped over the Executive Summary to concentrate on the meat of the report and its appendix.

Project Overview--Section 1.0 to 1.4; and Opening Memorandum in Appendix II-Volume II--Section 2

There is quote that states the project is an "integral part of regional transportation and environmental initiatives." My comments previously stated regarding the isolated nature of the proposed stations questions this point. In the opening memorandum in Appendix II, I have concern with the figures forthwith the numbers of riders served --is it 3,385 or 4,500; (9)

Appendix II--Section 2--Introduction 1.0; Table 1A; Table 2,; Table 3

Is the travel model taking into account all modes of active and passive transport. How can they be sure that the work trips in 1990 are accurate and whether they can reflect potential ridership. For example, in Table 1A, refer to six work trip to the Boston CBD from Spencer and project 11 trips in the year 2011 whereas Table 2 refers to 5 transit trips in the year 2011 which all originate in the Worcester Station according to Table 3. It is my belief that a Spencer commuter would not drive to the City of Worcester Station in prime time particularly since said commuter would have to traverse the local streets thru one-half of the City. Instead he could possibly opt for the Mass Turnpike in Auburn as a park and ride situation then transfer to alternative transit. (10)

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11 In addition, I question the use of the model itself. As stated in a report entitled "The Transportation/Land Use Connection" by Terry Moore and Paul Thorsnes, most metropolitan area models for transportation and land use "lack solid economic foundations. Predictably, these models fail to forecast changes in land use and transportation patterns with anything approaching the precision needed for a rigorous analysis of the long-run impacts of proposed projects....no computer simulation model currently exists that predicts land-use and travel patterns in large polycentric cities with the accuracy needed to evaluate incremental improvements to the transportation system." [Source: APA Planning Advisory Service Report., No. 448/449, 1994, pp. 7-8.]

Needs Analysis--Section 2.0-2.3, pg. 2-5

In this section, there is a quote which states "of more importance in terms of commuter rail service is the significant growth in journey to work trips to Boston and Cambridge....There are a substantial number of commuter work trips to Worcester as well. These trips might support a 'reverse commute' service to Worcester. The outbound morning and inbound evening trains proposed in the Worcester Extension service could accommodate such riders." I would like to know what documentation or forecasting is being utilized to substantiate this claim. Reverse
12 trips to Worcester for special events and the recreational trips to the State Parks as mentioned previously in this letter and other items should be elaborated in this study.

Project Elements--Section 3, Table 3.1-1, pg. 3.1; Sub-section 3.2--Stations, pg.3-15; Grafton Station, pg. 3-25; Sub-section 3.4--Commuter Rail Train Schedules, pg. 3-39; Sub-Section 3.6--Costs and Revenues, pgs 3-47,3-49; Sub-Section 3.7--MBTA Mitigation Policy, pg. 3-51;

The Table on Proposed Railroad Vertical Clearance Improvements notes three improvements in Ashland, ie. Howe St., High St., Fountain St. It was my previous understanding that Ashland's Fountain St. bridge is critical for movement of emergency
13 and other vehicles in Town and that said bridge would be reconstructed in a timely fashion. This therefore may not require the lowering of the tracks; however, does this impact upon the progress of the commuter rail or does lowering the tracks slow down bridge reconstruction? This may also be applicable to the High Street bridge which has a higher priority for reconstruction.

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With regards to "Generic Station Details", there is a comment that "parking lots will be constructed at each station, with the lot size being dependent on projected demand and availability of sufficient land for construction. In addition, each station will include lighting, landscaping, benches, and bicycle racks. Facilities will be provided to allow for installation of telephone and newspaper vending machines.

I do not believe that this description goes far enough as station area site plan. There should be more details and more amenities offered from a "bare bones" station. 14

In addition, "fencing will be installed between the inbound and outbound tracks", is this being consistent with the rest of the commuter rail presently in operation. 15

As for the Grafton Station and other stations, I have concern for pedestrian overpasses, train platforms, and the walking distances to the parking lots. Do these stations meeting the requirements under ADA? 16

Next, there is reference to "basic service" and "expanded service" that is proposed as well as the current "interim service." It my contention here that the transition from the interim service to the new services should be phased in over a period of time to allow for a complete study of the different components of the travel mode and its frequency including ridership, peak hour demand, and parking requirements. This is preferable over installing the stations without such a thorough examination of the commuter rail extension. 17

The MBTA estimates the operating costs at $12 million dollars with annual revenue projected at $5 million with a claim for 42% cost recovery that exceeds their target of 33 1/3% To the laymen this easily demonstrates that this line is not only operating at loss but is being heavily subsidized.

[See later comments under Section 4.0.]

Next, "if station generated traffic degrades the level of service from LOS D or better to LOS E or LOS F, corrective action will be proposed. Does this preclude corrective actions when levels of service drop yet do not fit in the above categories? 18

The study also states that "if an existing condition revels an unacceptable LOS for an intersection or roadway segment, and the addition of station generated traffic materially worsens that condition, every reasonable effort will be made to correct the problem created by the additional burden...." A more detailed explanation on this philosophy should be forthcoming. (19)

In addition the MBTA policy "provides for the expenditure of up to 2% of the project construction cost for noise and vibration mitigation. Consideration of the cost effectiveness of any noise mitigation measures must be weighted against the actual relief provided." Two percent may be too limited on this matter. (20)

As for wetland impacts, "the primary thrust of the right-of-way and commuter design effort will be to avoid wetland, floodplain and drainage impacts." This needs to be examined further in light of the Wetlands Protection Act's stringent rules regarding wetland alteration. (21)

Alternative Analysis--Section 4.0, Alternatives Considered, pg.4-2; Costs, pgs 4-12-4-14; Conclusion, pg. 4.4

I have considerable concern with the proposed alternative outlined in this report. One, there is concern that the Marlboro/Hudson traffic will be dumping out onto the rail stations at Southboro and Ashland. If this is the case, then the Mass Pike/I-495 station would be a paramount location and should be fast tracked for implementation.

Second, this report fails to note the current ridership for interim service and its resultant shift from the bus lines to the rails and vice versa and does not dramatically increase the overall ridership. Based on visual observations at the City of Worcester station, it has been noted that there is a higher level of commuters utilizing the rail in the morning peak hours, however, many of these riders switch back to the bus at night due to scheduling and delays on the trains. (22)

Next, the reliance on the spur lines from Marlboro and Milford are somewhat questionable. Here, the emphasis should be placed on the direct bus routes into Boston or major proposed intermodal stations such as in Framingham Center or Logan Express area near Mass Pike. (23)

The report further notes that the "station sites in Ashland, Millbury, and Southborough will be located in areas of mixed commercial and residential use...for these sites, there is a general convenience and improved access to Boston that they serve, by extending farther out from the downtown core the distance of a reasonable commute; this should improve property values generally." In the case of Ashland, the residents of the rail station area, have expressed the interest, to have their property rezoned to allow further land use options on their respective properties in order to get back a fair appraised value for the use of their respective properties.

Environmental Impacts--Railroad Right-of-Way--Section 7.0, pgs 7-10 and 7-11; pgs 7-17-7-19; Table 7.8.1--Historic Properties, pgs. 7-67-7-79; pg. 7-63; pg. 7-57; pg. 7-80; pg. 7-83.

The report states that "in Ashland, grade crossings at Cherry Street and Main street are protected by gates, warning lights, and bells. Located near the downtown section of Ashland, these crossings are heavily uses, particularly the Main Street crossing....the MBTA currently is exploring, with Conrail, possible remedial measures, such as replacement of the control box." These two grade crossings are critical items for the future viability of the downtown area of Ashland. For instance, dropping European styled gates at the grade crossings would effectively create a "Berlin Wall" atmosphere that would separate the downtown into two separate parts. (24)

Long term remedial measures such as elevating the rail tracks would have a huge appearance problem for the community and would replicate past mistakes such as the Central Artery in Boston. Depressing the tracks would be a better alternative; however, there are concerns over the EPA contamination issue. Consideration should be made for depressing these tracks since it is important to maintain the viability of this village center. Suggestions proposed or implied in this report for said crossings do not foster this community sense. (25)

In addition, the report states that the Ashland station will provide ample parking on the south side of the tracks and therefore minimize rail crossings and traffic through the downtown area to points beyond such as the Mass. Pike and Route 9. It is hoped that this would reduce the vehicle ridership; however, there are going to be additional commuters from the nearby towns of Holliston and Hopkinton that will offset this gain.

As for costs, Table 4.2-2 depicts Commuter costs at 3.24 million with revenues of $5 million which make such service run at a profit of $1.76 million. Looking at the rail alternative #1 (basic service) in Table 4.1-8, calculates total annual cost of $7.35 million and with annual revenues at $3.82 million running deficit of $3.53 million. These two table along strong state in terms of dollars and cents that buses are more profitable alternative. Therefore, in order to help justify this fixed mass transit mode of travel, other items need to be stressed such as air quality and compatible land uses.

Under the "Conclusion" in this section states that the "proposed basic commuter rail service improves air quality over 'No Build', and also serves long standing MBTA policy goals around the development of a viable public transportation system which affords the various regions around Boston equal access to its downtown." The MBTA goal needs to be stressed further. In addition, the issue of air quality needs to be justified further in light of the nature of the proposed locomotive equipment.

(26)

Ridership Projections, Regional Traffic, and Air Quality Impacts---Section 5.0

Concern with definition of service area and ridership projections from CTPS>

Socio-Economic Impacts--Section 6.0, pg.6-3.

According to this report, the "project is not likely to have or to create significant development effects....Nonetheless, there may be a marginal impact on development, particularly housing development, since the project makes the area more attractive to those who work in Boston..." The emphasis of this project should be to stimulate compatible land usage near the tracks to create a significant amount of density and useful commercial and industrial land uses that would service the train. This is not referenced in this report other than briefly mentioning the locational advantages of rental units.

(27)

In addition, "the project's line impacts on property values are likely to be negligible" according to the report. Again, this may be a very strong understatement if this project is to work correctly then property values will change appreciably.

(28)

As for air quality, I have previously mentioned the importance of examining the locomotive exhausts at the various proposed stations along the corridor.

With regards to noise, "the primary cause of noise impact along the corridor under expanded service is the additional 12 train operations per day. The increased maximum speed projected for both passenger and freight trains is also a factor in some areas.

For localized areas, the sounding of train horns near grade crossings has a significant contribution to the total noise exposure." In addition, "four of the nine residential listed as impacted...are in a multi-family elderly housing building. It should be noted that at the current time, that the Town of Ashland is working diligently to minimize the impacts of the soundings of the train horns. This is a very significant issue within the community of Ashland when train horns are going off at all different hours during the day and night and disrupting the inhabitants.

Under "path noise control", the report notes that "potential train noise mitigation provided in Table 7.3-3 indicates the estimated length of noise barrier needed to mitigate all train noise impact in each community...." Mitigation cost estimates were based on a 16-ft high noise barrier cost $20 per square foot. The minimum barrier height for diesel-hauled trains is significantly higher than that of electric or rapid transit trains because the barrier must be high enough to shield the predominant noise source, the locomotive exhaust."

In addition, "the barrier locations, lengths, and heights estimated at this stage [are] preliminary. Detailed barrier designs will be designed during the final design stage..." The barrier locations along with the fences need to be examined as soon as possible, since said items are mitigation measures for nearby land uses but also have aesthetic design considerations as well. (29)

Also note under "safety and security" sub-section, "the standard six foot high chain link fence would be utilized at most of the fence sites along the right of way."

Under the "wetlands" sub-section, there is a Table on Total Project Wetland Impacts (pg. 7-57), in terms of Ashland in referencing two sites in Ashland, ie. east and west alternates, and footnotes the fact that the western site would require filling in approximately two acres of wetlands. There is a concern here as to whether the local and state authorities would allow filling in of wetlands greater than minimal thresholds. In addition, the basis of mapping said wetlands needs to be determined in greater detail. Also note the habitat maps in Figure 7.0-1. (30)

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Page 10

As noted in the Historic Properties/Sites Table, the Town of Ashland has a number of historic properties and sites. However, with the exception of the bridges, news store, hotel, and old rail station, all the remaining locations have question marks in terms of potential eligibility.

31 Under the sub-section on "archeological resources", there is reference to an old mill site, ie. Aldrich mill, on the Southborough-Ashland town line and states that it is in close proximity to the Sudbury River. Further elaboration on this cultural resource is necessary.

32 Under the "proposed mitigation and mitigation options" sub-section, the total length of noise barrier required to mitigate noise impact is estimated to be 1,200 linear feet for basic service and 16,950 linear feet for expanded service." This is quite a change between the two levels of service and should be noted in relation to fencing as previously mentioned.

Sections 8 thru 10: no comment.

Alternative Commuter Rail Station Sites/Station Designs--Section 11.0, pg. 11-3, 11-13-19.

33 The reports notes the two options for Pleasant Street in Ashland, one would provide parking for 350 cars with one commercial property taking, the other would require 480 and two commercial properties. The Pleasant Street" site noted on page 11-14, is the favored site of the MBTA. "The revised ridership figures prepared by the CTPS showed that the majority of the riders at an Ashland station would originate in Holliston and Ashland and travel through the center of town to reach the station." This item should be questioned since there are other abutting towns that would also utilize this station such as Marlboro and Hopkinton.

The Ashland Station-East site is the preferred site at this time. Other sites were considered as well. This preferred site does mention the location downgradient from Nyanza and the site cleanup. "Although the MBTA, DEP, EPA, and Town of Ashland all agree that this site is the preferred alternative, final details (particularly the liability and legal issues) have yet to be confirmed. As a result the High Street/Split Configuration (Site D) and Pleasant Street/Megunko Road (Site B) will continue to be carried forward." These agencies all need to be cooperating together to make this station area and its surrounding truly blend in with the positive fabric of the community. Initial contacts have been made with these agencies, however there needs to be incentive from and for both the public and private sectors.

Environmental Impacts--Millbury Station--Section 12.0

A number of figures depict the isolated location of the Millbury station particularly 12.1-4. This is reinforced in that CTPS projects do not forecast any patrons walking to this station.

Environmental Impacts--Grafton Station--Section 13.0

This site as depicted has potential to blend in with nearby land uses such as Tufts, yet again no pedestrians are forecasted in the CTPS projections.

Environmental Impacts--Westboro Station--Section 14.0

Again the station site is isolated and this reinforced in the CTPS projections for no pedestrians. Said station itself serves riders in Northborough, Shrewsbury, and Upton over Westborough residents. Of all the sites between Worcester and Framingham, this site presents the least benefit to the community at hand.

Environmental Impacts--Southboro Station--Section 17.0

This is a key station in the system since commuters from Southborough, Hudson, Marlboro, and Hopkinton, and Westborough, could utilize this site which totals a ridership of 550 people in 1996. The greatest majority of commuters at this stop come from outside Southborough and have the opportunity to utilize the excellent superhighway network in the vicinity. The only constraints in the year 2001 is due to parking constraints.

According to projections, 83 riders will be drop off, the remaining 467 would be park and ride. CTPS does not project pedestrian ridership however there are residential areas nearby and therefore the Town of Southborough is requesting sidewalks in this area.

This site becomes a "de-facto" regional station. The Cordaville/Southville site like the Ashland site should be primarily village oriented stations that serve the neighborhood. Said stations secondarily should be intermodal in character to encourage pedestrian and bicycle traffic. In addition, the Southboro station should be linked on an access basis with the Hopkinton State Park.

(34)

(35)

Under the "assignment of riders" sub-section, the report states that the "observations of distribution by train tend to show the greatest number of riders on the trains arriving at Boston close to 8:30 A.M. Trains arriving earlier and trains getting to Boston after 9:00 A.M. tend to attract fewer riders." This observation is a little disconcerting in the fact that a number of people would commute at an earlier time prior to arriving in Boston at 8:30 AM. such as arriving in Boston at 8:00 A.M.

In addition, there is no reference to non-commuter trips to Boston for other reasons such as recreational and cultural activities.

(36) In the sub-section on 1996 traffic impacts for Southborough, Table 15.1-10 states that a number of road segment levels for peak P.M. hours, the LOS is at E level. This is disturbing and should be improved upon.

(37) The report notes the significance of the 19th century mill village in Cordaville, yet this station is not being addressed enough with this in mind.

(38) Also, the visual impacts should be reviewed in detail such as lighting along with the aesthetics of the fencing.

Environmental Impacts--Ashland Station--Section 16.0

The report states that "the ashland station is projected to attract 738 patrons in 1996, with daily ridership increasing to 1,093 by the year 2011." This becomes one of the highest ridership stops along the rail and would transform the Ashland site into a "de-facto" regional station. It is not the intent of this Community to become a regional station, the fabric of the community would be destroyed by such wholesale change without accommodating mitigation measures and nearby site improvements and inducements for development in the area particularly around the Nyanza locus. Again this should be a local stop in keeping with the village concept of this community.

In the sub-section on "rail ridership projections, the report states that the origin of 738 riders include 377 from Ashland The rest come from surrounding Towns. Again, these figures are very disconcerting, depending on the nature of the Southborough site, ridership would be more regional in nature with significant number of out-of-town commuters.

On a positive note, with the exception of Worcester, this is the only station which the CTPS predicts walk trips to the station. Although the number is small at 20 walkers, this number could increase dramatically.

Next, although Figure 16.1-3 depicts daily and weekly traffic on a number of streets in Ashland it fails to show the amounts of vehicles on Route 135. This volume currently is in the vicinity of at least 17,000 v.p.d. This is a major factor that should have been placed on this drawing. (39)

In Tables 16.1-15 and 16.1-16 on road segments, the report depicts a LOS of E for Cordaville Road. This should be examined for improvements in more detail. In addition, a proposed roadway should to the site should be factored in the traffic analysis and design as well. (40) (41)

In the sub-section on "hazardous materials", the reports cites a listing of three sites near the proposed station that are "confirmed disposal sites for investigation" by DEP. This includes Nyanza, 3C Electrical, and the Perini Corporation. These disposal sites (ie. Brownfields) should be evaluated in an overall plan in conjunction with the rail station and surrounding land uses. The sites should be cleaned in a proper matter for reuse. (42)

In this section, there is further description of the proposed Ashland Station-West site. Again note the filling of the approximate two acre wetlands to make this a viable site. Unless said site wetlands have been improperly depicted and are not significant under the Wetland Protection Act, further analysis of this site may be counterproductive.

In subsection 16.22 on pedestrian safety, the report states that the potential twenty walkers "could use the existing sidewalk along the north side of Pleasant Street to reach the commuter rail station." This is unacceptable, infrastructure improvements are necessary on this street to make the area more pedestrian oriented, specifically installation of two sidewalks in "class 'a'" condition. (43)

Also the issue of fencing, should be investigated in terms of aesthetics as well.

Comment Letter No. 37

Page 14

Regional Station Analysis--Section 17.0

Only comment is to re-energize examination of Westboro I-495 site.

Environmental Impacts--Framingham Station--Section 18.0

44 The Framingham station and the impacts of new commuter rail service should be investigated in far more detail. The Framingham station in the downtown would end up as a regional intermodal facility. This is particularly with regards to the interim service and the current study of Route 126.

Environmental Impacts---Boston South Station/Back Bay Station Section 19.0

45 Interesting "pedestrian levels of service drawing on page 19-3. Could such an analysis be used on other stations such as the Framingham site.

Appendices in Volume I

October 8, 1992--Certificate of the Secretary of Environmental Affairs Establishing a Special Procedure for a Major and Complicate Project

46 Under the special procedures, the certificate mentions the level of design stages for this project. Are these correct as stated? In addition, this process allows the MBTA discretion in timing of the filing of the Final EIR, if this still holds, it is recommended that the interim service, and staged levels of increased service be analyzed more thoroughly including examining the ridership and that time be allotted to each community to devise a station area plan with local and state help.

At this point in time to push this EIR would jeopardize major goals in improving the environment, prohibiting sprawl, and mitigation air quality.

October 22, 1992--Certificate of the Secretary of the Environmental Affairs on the Environmental Notification Form, pg. 9

In the ENF certificate, there was a question raised as to why the 400 space parking proposed for Pleasant Street was scaled back and if ridership projections are higher where will the parking be accommodated? In the judgment of this review, this goes to the heart of whether this is a local or regional station.

Comment Letter No. 37

Page 15

In addition the ENF further states that "given that the station is in a transition area, the EIR should consider how this station can tie together the mix of uses by means of layout, design, etc. For example, a commenter has identified a need for sidewalks on Pleasant." These comments reiterate the need for rail station that is in keeping with the future enhancements to the neighborhood and acts such as catalyst.

January 14, 1994--Certificate of the Secretary of Environmental Affairs on the Notice of Project Change

This commenter will only reiterate the need to study interim service and evaluating the phasing of increased levels of service over time. 47

CAC-Citizens Advisory Committee--Comments on Draft Environmental Impact Report, pg. 2

The Citizens Advisory Group correctly suggests that there are unique growth scenarios occurring in the MetroWest area. The Ashland growth numbers are astronomical and reflect this phenomenon.

Next, this reviewer concurs that traffic should be diverted onto collectors as opposed to local streets. Next the comment regarding complete train schedules in well taken along with noting the timing of the train ride from Boston to Worcester. For example, how can the basic service take 67 minutes when the interim service takes up to 70 minutes. 48

Also,this reviewer concurs that mitigation measures should be completed prior to the opening of each station. Next, the cost recovery ratio is 64% on the current Framingham line, with the extension it drops to 42%. This needs to be explained more fully as stated by the CAC. 49 50

Other issues besides the operating costs should be raised and the benefits more visually spelled out. The CAC also notes that the report does not state where the remaining 58% of the operating budget will come from, this too needs further explanation. 51

Finally, "small towns which are already predicted to have higher ridership than...[Worcester] are understandably worried that the projections could be underestimating demand." This should be clarified in terms of interim service and future phasing of increased levels of service. 52

Assessment Comments by Reviewer

This reviewer believes the assessment formula is all wrong. Why are towns penalized for using the MBTA system. Why are some towns such as Franklin given free rides as opposed older urban areas which carry the bulk of the mass transit ridership.

Perhaps it would be fairer to approach assessments in one of two manners: one, state-wide assessment based on a number of factors such as ridership, population, land use impacts, etc; two, the elimination of assessments on those communities utilizing mass transit and transferring said assessments on those communities that do not support mass transit and encourage automobile usage. Of the two, I would prefer to see the changeover of equalized assessments to those communities that are not availing themselves of mass transit or are not improving air quality and environmental issues.

Appendix--Volume II

Section 2.0--CTPS Ridership/Parking Demand
Sub-Section 8.0 Model Results

This sub-section discusses six separate scenarios in the modeling. It notes that the Ashland station would have the highest demand for parking spaces about 760 spaces in 2011. "We assumed that most of the existing Southborough and Ashland riders who currently use the Framingham station would now switch to the proposed Ashland and Southborough stations. This would free up some parking constraints at the existing Framingham station. It is likely that these excess spaces may be filled by the residents of Framingham and Holliston. A more thorough analysis of latent demand at Framingham station is necessary to verify this conclusion."

(53)

"If the parking capacity at Southborough station is constrained to 420 spaces, then the demand at Ashland Station would be even higher, nearly 880 spaces in 2011. The parking demand at Worcester station would be around 350 in 2011."

(54)

In addition, the third scenario projects 1,670 spaces in Ashland and Worcester by 2011 which is higher that the I-495 and Worcester combination.

This reviewer feels this comments very disconcerting. Therefore, I strongly feel that this latent demand needs to be studied immediately and in conjunction with the final EIR. (54)

In Table 3, the Ashland Station shows persons by trip origin totaling 946 for the year 2011 while transit trips in Table 2 is 523. This needs further explanation. (55)

In Table 1, there is two references to Scenario 1 these need to be clarified and corrected. (56)

In Table 40, entitled "Worcester Commuter Rail Extension Study, Highway Impacts", is very disturbing to the reviewer. We are talking about a total of a few thousand cars between Boston and Worcester for both Mass Pike and Route 9, it is doubtful that this will significantly change the total road volumes on these superhighways.

Noise and Vibration--Section 3.0

Is the Old Colony example truly representative of this commuter rail line.

In sub-section 2.1.2 on "pure tone sources" there is concern over the different criteria on noise impact assessment between the Massachusetts DEP Noise Policy and federal guidelines in light that Conrail and Amtrack horn blowing policies. In addition, best new technology should be used to minimize noise impacts rather than current equipment. (57)

With regards to the 5dBa level parameters, these measures should be evaluated as well. (58)

Archaeological Survey--Section 4.0

The historical maps of Framingham and Ashland should be replaced by more readable copies. (59)

Next reference to Lloyd's Diner in Ashland is incorrect it is in Framingham opposite Keefe Tech. (60)

Finally, I have some concern interpreting Table VIII and Figure VIII, the quality and referencing between the two should be improved. (61)

Comment Letter No. 38

Town of Ashland, Massachusetts

OFFICE OF

SELECTMEN & TOWN MANAGER

101 MAIN STREET, 01721

NB/JD

TERESA M. EVANS, *Chairman*
GARY A. GHILANI, *Vice Chairman*
DAVID F. TELLER, *Clerk*
BARRY M. BRESNICK
SHAUN R. FINNEGAN

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DEXTER P. BLOIS, *Town Manager*
Tel. (508) 881-0100
Fax (508) 881-0102

November 22, 1994

Ref 174

Honorable Trudy Cox, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Attn: MEPA Unit

Re: EOEA #9154, MBTA Commuter Rail Extension

Dear Secretary Cox:

The Board of Selectmen has had an opportunity to review the Draft EIR submitted under the above noted EOEA file number. More specifically, their comments hereunder pertain to the Ashland station discussed in the DEIR.

Some of the Board's concerns are addressed in the "October 1994 Comments" included with comments from the Citizens' Advisory Committee in the DEIR. However, the Board, after reviewing the DEIR felt that additional concerns need to be addressed.

The Board, at its meeting November 2, 1994, voted to submit the following concerns to you for consideration in determining the scope of the final EIR:

1. The impact on Route 135 at the intersection of the driveway entrance to the south parking facility will be significant:

   a. the intersection must be signalized as a matter of public safety; and,

   b. the intersection must be widened to provide turning lanes.

(1)

(2) 2. Other intersections in Ashland which are already at D or F level of service (LOS) will degrade to failure or worse with the impact of traffic from the proposed station. The applicant must be prepared to mitigate this impact. The Board is concerned that anything less will result in gridlock at certain times of the day.

(3) 3. While not an environmental issue, per se, the Board is concerned with the negative tax revenue impact of the project. Loss of property tax revenue will result with "T" ownership of the land. Mitigating measures include adjustment of the "T" assessment and revenues from parking lot fees to offset the tax revenue loss.

(4) 4. While the Board's preference of site location is the East alternative, it feels strongly that the environmental impacts of the West alternative be thoroughly evaluated under the scope of the Final EIR.

Thank you, in advance, for your anticipated cooperation in this matter.

Yours very truly,

Dexter P. Blois
Town Manager

cc: Citizens' Advisory Committee
Mr. James Eng, MBTA
Mr. Frank Astone, Edwards & Kelcey, Inc.

Comment Letter No. 39

TOWN OF FRAMINGHAM, MASSACHUSETTS
PLANNING DEPARTMENT

Memorial Building, Room B2 | Main Office: 620-4852
Framingham, MA 01701 | Housing Rehab Office: 620-4855

ARTHUR T. NOONAN
Planning Director

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MEPA

March 7, 1995

Ms. Trudy Coxe, Secretary of Environmental Affairs
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Attn.: MEPA Unit
Attention: Nancy Baker

Re: EOEA No. 9154
Worcester Commuter Rail Extension Project

Dear Secretary Coxe:

The Framingham Planning Department has reviewed the Draft Environmental Impact Report for the Worcester Commuter Rail Extension Project.

Our comments focus primarily on community assessments, gate closings, commuter service, access to the Downtown and Municipal Parking Garage from the improved train station and proposed mitigations. Issues concerning the proposed renovation of the South Framingham Station which would have been raised in a separate EIR required by Certificate of the Secretary of Environmental Affairs, (EOEA No. 10106) will be raised here, as the MBTA proposes to file a Notice of Project Change for the Terminal Project.

Assessments

As noted on page 6-7 of the DEIR, "Under current law, only Framingham and Ashland among the project communities might ... see a revision of their assessments to reflect changed circumstances of service." Framingham supports changing state law to allow more equitable division of the costs of commuter service, and urges the MBTA to vigorously pursue such changes.

The DEIR estimates an increased assessment for Framingham of 0.31%. It appears to concern itself primarily with assuring Towns other than Ashland and Framingham that they will not be further assessed. Although it states that the assessment impact on Framingham is small, (p. 6-10), the increased assessment must be measured against the negative traffic and parking impacts Framingham will experience due to additional gate closings and increased ridership from outside the Town seeking express service to and from Boston. (1)

From an already unacceptable 47 gate closings, Framingham has experienced 4 additional gate closings as of Fall 1994, and may be asked to permit an increase to 55 closings gate closings by 1996. This may increase under a possible Expanded Service to 56 closings, (some of them at peak hours). Thus one can well understand why the MBTA urges "the need for a corridor study to address congestion and unacceptable level of service through south Framingham" (p. 18-2). In other words, the MBTA itself will measurably worsen an already intolerable traffic situation *without* significant mitigation, *but with* an increased assessment burden. Since Framingham will have to allocate financial resources towards mitigation *caused by the expansion*, and will probably also suffer tax losses due to increased traffic and parking pressures on the Downtown, the Town feels an increased assessment is an unreasonable burden at the same time. (2)

Comment Letter No. 39

The Reverse Commute

While commuters to Boston have expanded travel opportunities with the Interim Service and will have even more opportunities with Basic and Expanded Services, there is little additional opportunity for reverse commuters. Commuters working in Framingham and wishing to travel to it by train from Boston have very limited choices. Commuters working in Worcester and wishing to travel to it from Framingham have only one AM arrival time: 8:10. But Table 2.35 of the DEIR states that there are 449 known people in Framingham who *presently* commute to Worcester to work (italics mine). Commuters living in Worcester or beyond and working in Framingham, (rather than Boston) will have four choices for AM arrival: approximately 6:40, 7:30, 8:10 and 8:50, but nothing thereafter until 12:10 . Under Interim Service, trains currently arrive in Framingham from Worcester too early for 8:30 to 5 jobs.

3 However, it is really not feasible to estimate proposed schedules from rough calculations from the DEIR. Such estimations are inadequate for actual review and comment on the Basic or Expanded Services without reference to the proposed schedules. The FEIR should be required to supply these schedules with reference to Framingham.

Gate Closings

4 In order for the Town to adequately review and comment on traffic and air quality impacts on the Downtown the FEIR should detail the times and duration of all proposed gate closings in Framingham.

Status of the Framingham Improvement Project

5 Although the DEIR details all important station improvements, it does not state that the outbound shelter will be retained, moved and restored when the track is relocated, as negotiated with Massachusetts Historical Commission. This should be stated in the DEIR.

6 The Town is aware that the MBTA must provide safe pedestrian passage from one side of the tracks to the other, but it would prefer that the proponent find a way to do this without resort to the massive overpasses proposed. At grade transfer points at the west and east ends of the platforms would be cheaper to construct, more passenger time efficient, more attractive and more user-friendly than the proposed design. Two such points would encourage the purchase of tickets at the sales outlet across Waverly Street

Proposed Mitigations

The DEIR proposes to work closely with Town of Framingham officials and offers a program of mitigations for traffic and parking impacts associated with expanded service and, perhaps, with the expansion of the station itself. The MBTA proposes to monitor Interim Service operations, perform ridership surveys and perform travel time studies of Route 126 prior to and after commencement of Interim Service. The Planning Department would appreciate an early

7 opportunity to study data developed by monitoring programs, ridership surveys and travel time studies of Route 126 prior to Interim Service, the last of which may be compete, as Interim Service commenced in the Fall of 1994.

8 The DEIR also proposes to monitor Framingham parking relative to Station Improvements in a possible and distant Phase II, but this study will be dependent on baseline studies which can only be performed at the current time. The MBTA should be required to perform baseline parking studies immediately, as well as closer to the initiation of the Station Improvement.

Comment Letter No. 39

The DEIR proposes to provide signage for parking at municipal parking lots and garage. This should be coordinated with a Downtown Streetscape Improvement program initiated by the Town. Additionally, this significant promise of assistance must be more completely spelled out so that the Town may adequately plan its Streetscape Improvement Program. The MBTA should work with Town officials to develop a mutually acceptable schedule, which should then be incorporated in the FEIR. (9)

These mitigation proposals are important, but they do not reach the primary negative impact on the intersections at Bishop Street/Route 135 and Route 126/135: additional gate closings and increased commuter traffic. "The basic rule of thumb states that, 'if the MBTA breaks it, it will fix it.' " [Page 3-50] Page 3-51 states that "If an existing condition reveals an unacceptable LOS for an intersection ..., and the addition of station generated traffic materially worsens that condition, every reasonable effort will be made to correct the problem created by the additional burden, generally in cooperation with MHD or the relevant town". [Page 3-51] See also comments by the Citizens Advisory Committee on this subject, (page 3) on the length of time the proponent is causing diminished service, as well as the degree to which the proponent is diminishing these services.

However, the DEIR presents *no* data on the impact increased service will have on these critical intersections, or indeed, on the Downtown as a whole. The FEIR should be required to study both intersections and the Downtown with reference to increased gate closings and additional traffic due to increased ridership, with particular reference to peak hours. (10) It is interesting to note, though, that working with the data supplied in Table 4.1-1, the MBTA estimates Framingham's population to grow by 1,300 persons between 1987 and 2010 and its work trips to downtown (Boston) to grow by 1,070, or only 230 more additional people than work trips. Of-course this does not discuss additional work trips in the reverse direction, to Worcester, a location made more assessable to Framingham residents by the increased service, if not by proposed scheduling. (11)

Lastly, because the station will be moved far to the west of its present location, pedestrian access to the municipal parking garage, (sited with reference to the original station location) will become much more difficult for commuters. The EIR should require the MBTA to assist the Town to negotiate with Conrail a pedestrian right-of-way over the "wye" to connect the new platforms and the municipal garage. This should be accomplished well before the start of proposed parking improvements under Phase II. (12)

Thank you for the opportunity to comment on this project. Please include the Framingham Planning Department in the distribution list for future notices and reports with regard to this project.

Sincerely,

Samuel P. Swisher
Acting Planning Director

Comment Letter No. 40

TOWN OF HOPKINTON
OFFICE OF THE SELECTMEN
18 Main Street, Hopkinton, MA 01748-2160
(508) 497-9700 • Fax (508) 497-9702

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March 8, 1995

Secretary Trudy Coxe
Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Att: MEPA UNIT
100 Cambridge Street, 20th Floor
Boston, MA 02202

Re: EOEA - #9154
DEIR - Worcester Commuter Rail Extension

Dear Secretary Coxe:

The Hopkinton Board of Selectmen would like to take this opportunity to offer the following comments on the Draft Environmental Impact Review submitted by the Mass. Bay Transportation Authority, proposing the extension of commuter rail from Framingham to Worcester. These comments are in reference to the project in general and, more specifically, to the proposed station in Southborough, near the Hopkinton Town boundary.

The DEIR fails to meet a component of the Project's scope. The MBTA has not addressed the potential financial impact on communities for which this rail service will be made available to commuters. Assessment issues have been an ongoing dispute between the communities and the MBTA, during the ENF stage, as documented through the Citizen Action Committees. Communities to be affected by commuter rail should know, prior to implementation, if an assessment will be levied for the towns along the route, and what formula will be used to determine assessments. (1)

The Board of Selectmen is concerned with the proposed overpass, as being unacceptable, as it is aesthetically incompatible with the character of the neighborhood. There is a pedestrian underpass running under the tracks, which could readily be reactivated. Security issues could easily be addressed with adequate lighting, a wide tunnel and 360 (2)

mirrors.

3 The Town of Hopkinton is concerned with a proposal for a jogging trail around Cordaville Mill Pond. Half of the Pond is within the Hopkinton Town bounds and residents in Hopkinton may be adversely affected by a loss of privacy and potential loss of aesthetics in this area of the Pond.

4 The MBTA has recently agreed to build some sidewalks near the proposed station. One of the goals of the Town of Hopkinton's Master Plan is to provide sidewalks from the proposed station to Hopkinton State Park. The Board of Selectmen hopes this concept will be considered in the final layout of sidewalks around or near the station.

5 Parking lots around the station will need lighting for security reasons. Since there are homes in the area, provision should be made to shield the lighting, to keep from having excessive lighting shining on the homes of the neighboring residents. Preferably, tall conifers should be used as a buffer between the parking lot and nearby homes.

6 There has been some discussion of a multi-level parking garage being built next to the station, in Southborough. The Board is concerned with the negative impact of such a structure in this rural area. We would like assurance that such a structure will not be built.

7 We understand that the Town of Southborough has requested that a portion of the parking lot be reserved for Southborough residents. Although we may not normally support exclusive parking, if the State grants this request, we believe that the Town of Hopkinton should receive the same type of benefit, due to the increased traffic and pollution which will affect our community with the building of this station.

8 It has also come to our attention that weekend service may not be implemented in the commuter rail project. We ask that this be reconsidered, so that residents in the affected towns would have an opportunity to use the commuter rail on weekends.

9 Finally, the Board of Selectmen would like to ask that more emphasis be placed on the financial impact of this overall project, including alternatives such as commuter buses services, rather than the commuter rail. We question the large subsidy which will be necessary to operate the commuter rail when this service could be provided much more economically by commuter buses.

10 The Town of Hopkinton and neighboring communities have just been made aware of a new commuter bus service being offered by Peter Pan Bus Lines, which will stop in Hopkinton and

neighboring communities and transport residents to Boston daily at a very reasonable price. Should this service be found to be successful, we believe the overall cost will be much less than for commuter rail, have much less impact on the taxpayers; both for Hopkinton and for the State. We hope this alternative will be examined more closely in the EIR stage of the process. (10)

Thank you for the opportunity to provide comments on the proposed MBTA Commuter Rail Extension project.

Sincerely,

Joseph A. Strazzulla
Chairman
JAS/ek

Comment Letter No. 41

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MAR 1 3 1995
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March 8, 1995
Wednesday

Ms. Trude Cox
Secretary, Environmental Affairs
100 Cambridge Street
Boston, MA 02202

(617) 727-2754 Fax

RE: Worcester Commuter Rail Extension Project (EOEA #9154)
November 1994 DRAFT Environmental Impact Report (DEIR)

Ms. Cox:

It is truly hard and time consuming to express the depth and breadth of my comments about this proposed Worcester Commuter Rail Extension Project.

On the one hand, the widely held view is that since the Interim Service was begun on September 26, 1994, it is a fait accompli that this proposed Project will be approved. This view holds that it is a waste of time, breath, ink, and energy to suggest Rail should NOT be approved.

On the other hand, we now have a three volume November 1994 DEIR. It is a re-issued version of the two volume August 1993 DEIR that was withdrawn because of its very substantial short-comings (including not having any economic evaluation of potential bus alternatives or any other reasonable alternatives nor potential financial impact MBTA Local Aid (Cherry Sheet) Assessments). Those, of course, followed from the January 1990 Commuter Rail Extension Feasibility Study.

Though you have to dig for it, it is extra-ordinarily obvious in the November 1994 DEIR that the Commuter Bus alternative is so vastly superior and sensible in terms of risk, cost, service, and benefit over the proposed Rail Project that any rational person would immediately select the Bus alternative over the Rail option. (1)

What's more, should the currently estimated commuter count actually materialize and eventually reach a tremendously higher number (2,590 commuters estimated in the year 2010 (Table 4.1-2 pg 4-7)), the Rail option might at that point be sensible to consider for the long term. And ABSOLUTELY NOTHING is lost in the mean time. The rail corridor is not going to be abandoned or used for another purpose. The option to upgrade to Rail will continue to exist long into the foreseeable future. And any buses acquired could be re-used elsewhere for purposes that have an insufficient number of persons to make rail reasonable or even sold off, if necessary. And the buses are much more flexible and can potentially be used for other special public or private events (say Patriots football games played in Foxboro or Centrum events held in Worcester or conventions held at locations not near MBTA facilities).

Section 4.2 Commuter Bus Service Alternative

"The DEIR evaluated a more comprehensive Commuter Bus Service Alternative, than was considered in the Feasibility Study. The performance standard for this alternative was to approximate, by means of peak hour express and off peak semi-express bus service, the commuter rail services proposed by the preferred alternative at its respective stations" (pg 4-12) and assumed "the same volume of patronage" (pg 4-13). This Bus alternative has tremendously smaller construction and operating impacts (particularly noise and vibration) than Rail as well as air pollution "VOC emissions [that] are very close" (Section 5.5 Analysis Results pg 5-14). (2)

In particular, on page 3-50 of the main volume of the November 1994 DRAFT report, Table 3.6-3 lists the Net Annual Cost of the Worcester [Commuter Rail] Extension Project as $10,308,332. On page 4-14 of the same volume, Table 4.2-2 lists the Net Annual Cost of a Commuter Bus Alternative as $(1,763,084). The parentheses denote a negative cost - (i.e. a profit). That is to say that the Rail version would be a $10.3 million cost/deficit each year whereas the Commuter Bus Alternative would operate at a $1.7 million profit/surplus every year to the benefit of the Commonwealth/MBTA. Both of these net costs after each option garnered $5 million in Annual Revenues. The capital cost for the Rail Extension Project so called preferred alternative is $112 million (Table 3.6-1 pg 3-49) versus the Bus Alternative at $28.4 million (Table 4.2-1 pg 4-14).

What's worse, I believe that corrections to or possibly a more appropriate version of the Net Annual Cost comparisons will show the Rail Alternative to be <u>even less</u> economically favorable. In particular, depreciating various items over their potential life times (Land, Roadbed - 100 years; Parking Facilities, Tracks, Bridges, Signals, Stations, Layover - 30 years; Rolling Stock - 25 years; Buses - 12 years) may be a technically proper accounting method but it does nothing to reveal the true financial impact on the Commonwealth. (3)

One of the largest portions of the actual cost to the Commonwealth will be the cost of debt service, invariably based on a 20 year term and typically for 5, 6, or 7%. So structured, the total cost of the debt service to taxpayers is, as a rule of thumb, approximately double the capital cost. The average annualized cost, therefore, is roughly 1/20 of twice the capital cost. I would urge that the actual annual cost per year to the Commonwealth be used as the cost comparison (Tables 3.6-2,-3; 4.2-1,-2). As such, the Annualized Capital Cost for Rail (Tables 3.6) is likely to be around $10 million, each and every year for 20 years, rather than the $3.3 million shown. Likewise, for Bus (Tables 4.2), the Annualized Capital Cost is probably closer to $3 million rather than the $1.6M shown. When the actual numbers are generated, I expect Rail will become <u>even less</u> financially feasible to the tune of <u>at least</u> $5 million or maybe even $10 million, each and every year! (4)

On a different aspect, section 4.1 <u>Feasibility Report Analyses</u> consideration of a "Bus Alternative" on pages 4-1 thru 4-11 is apparently directly from the January 1990 Feasibility study

with no update to match section 4.2 Commuter Bus Service Alternative on pages 4-12 thru 4-14 and beyond. For example, 4.1 says "The Bus Alternative never attracts as many riders as any rail alternative." and Table 4.1-2 lists the Daily Inbound Person Trips - Year 2010 as 1530 for the Bus Alternative. Yet 4.2 assumed "the same volume of patronage for the commuter bus alternative". These sections are inconsistent. (5)

On some technical aspects, I would like to have section 4.2's "approximately 57 buses costing approximately $275,000 each" clearly described as to what type of bus is being considered. I assume it is a luxury coach boarding about 47 passengers, plush seating, air conditioned for summer and heated for winter, with a two way radio for communication, and a single toilet compartment. (6) Also, it might be helpful to have a dimensional comparison of seating and aisle space available on both the bus and rail. Additionally, the $1.6 million figure listed in Table 4.2-2 for Annual Operating Cost (Buses only) amounts to only $28,500 or so for each of the estimated 57 buses. (7) Somehow that seems too low in light of the expenses for mileage, maintenance, and the bus driver's salary & benefits.

On a generic aspect, I would like to point out that a Commuter Bus Service Alternative is likely to work out essentially as an express service from each community served. And the site(s) for pick up and drop off don't need to be tied to the track bed and can be selected based on a much wider set of criteria. The proposed favored Rail project would eventually become more of a milk run, with 6 stops from Worcester to Framingham. It is worth noting that the ridership of the Interim Service currently enjoys non-stop service from Worcester to Framingham and then non-stop into Boston. That has actually drawn increased ridership at the Framingham station. (8) So much so that it has drawn the attention of the local press. The municipal parking garage across from the Registry of Motor Vehicles is now being utilized much more, even though it is 4 blocks or so from the station. It seems the type or level of service the ridership really wants is non-stop/express, or as close as possible. (9) For communities further west than Framingham, the Commuter Bus Service Alternative can provide that type or level of service to a much greater extent than Rail can. And at more or less the same travel elapse time.

At this time, it seems that the $4.75 each way MBTA Interim Service has essentially killed the $7.50 each way Peter Pan commuter bus service from Worcester to Boston. (10) As some sort of compensation or mutually agreed consideration for not going to Court, the MBTA is now going to subsidize Peter Pan for new commuter bus routes from at least Westboro, Hopkinton, Holliston, and Ashland. (11) This is what the MBTA should have done all along. 5 YEARS AGO! It could have already established/verified a true level of ridership! But to do both the Bus and the Rail would split the potential ridership between the two modes of travel. (12) The total of all expected riders from the Ashland, Southborough, and Westborough stations is 1,669 commuters. If those commuters are using a Bus instead, that leaves only 1,032 rail commuters at the Grafton, Millbury, and Worcester stations (total 2,701 in year 2011, Appendix - Vol I pg 1-7, Table 1.1-2 - Expected Ridership Without A Regional Station). The $112 million dollars in capital costs is a very tough nut to crack, even if it would be somewhat reduced with, say, 3 fewer stations to build and maybe one or two fewer train sets. (13)

Maybe the best political compromise of all would be to continue service to Worcester with the Interim Service as is and provide Bus service to the other communities, at least initially. Worcester and Framingham each might continue to enjoy an Express level of service, but without any additional expense for building the intermediate stations or purchasing any additional train sets. Maybe it would even be unnecessary for the MBTA to fund any additional rail improvements. (14)

6.4 Assessments

This section is particularly lamentably because it continues and perpetuates the uncooperativeness and unwillingness of the authors of the DEIR to even do as little as describe the current Assessment scheme in place for the existing 78 MBTA communities. And that is inspite of the efforts I had personally undertaken to provide an evaluation of the financial impact on the existing 78 MBTA communities. Attached is Table I - FY94 MBTA Assessments that was originally provided to Secretary Cox on November 19, 1993 as a comment to the withdrawn August 1993 version of the DEIR. I repeat that previous request and would ask that these tables or a more recent or more official versions be placed in this section 6.4 Assessments. Table I's purpose is to demonstrate that using an estimate of $25/Capita is a practical and reasonable estimate for Table II - Estimated Assessments.

There is no doubt that under "current law" (a phrase that appears no less than 7 times in this section's first 2 pages), there are NO Assessment to any city or town not "currently" in the legislatively defined MBTA district. The concern is for the future.

I do NOT suggest that the same formula will be used at some point in the future. Rather, it is indisputable that at least once a formula was enacted by the Legislature and signed by the Governor. Given that, it is clear that it is possible that at some point in the future additional communities could be added to what is currently known as the MBTA district. In that eventuality, the magnitude of Assessments charged to communities might, more or less, be something like the present system. Then again, maybe something radically different, higher or lower, might appear. In either case, the magnitude of possible Assessments, if/when they are ever made, is likely to be significant - in the hundreds of thousands of dollars area for each community. (15)

Given that the various existing or proposed additional spurs to the MBTA Commuter Rail lines leading to Boston would cover roughly an additional 100 or so primary or adjacent communities, it would seem there will be a significant and substantial disparity between the $125 million or so of Assessments paid by the current 78 MBTA communities and the $0 paid by the additional 100 or so newer commuter rail communities. Some naive persons might think the Legislature would reduce or eliminate the Assessments on the 78 current communities. Knowledgeable persons who are aware of the Legislature's actions over the past 10 and 20 years cannot believe that will ever happen. Instead, they know, as surely as the sun will rise tomorrow, the Legislature will eventually be in dire need of a bit more revenue, as is the perennially case, and opt to raise revenue via more extensive Assessments. Attached is Table II - Estimate of potential

MBTA Assessments at $25/Capita that was originally provided to Secretary Cox on November 19, 1993 as a comment to the withdrawn August 1993 version of the DEIR. Again, as I requested earlier, I would ask that these tables or a more recent or more official versions be placed in this section 6.4 Assessments. (16)

Ridership

I still do not have a lot of confidence in the estimates, especially those that project 20 years into the future, when traffic in Boston "will be really bad". This Rail project is ignoring the mega-trend toward working collectively from widely separate locations via electronic interconnections. A mere fraction of the tremendous sum proposed would be much better spent on encouraging the hauling of information to an fro rather than human beings. (17)

Budget Busters

I think it would be appropriate to include a 10 or 20 year vertical bar charts on the MBTA's subsidy provided by the taxpayers of the Commonwealth, the total ridership, the total fare revenue collected, the history of fare increases, and inflation. (18)

Section 8.0 ENF Comments Appendix - Volume II

It seems inappropriate to relegate the public's comments to the very end of the last Appendix volume, especially since the Appendices are not normally provided as a matter of course - rather one has to specifically request them. Also, these comments are virtually all from September 1992. I would request that the comments relative to the November 1994 DEIR be placed at the end of the main first volume. (19)

Miscellaneous:

I would ask that revisions made to the DEIR be noted with revisions bars to the left of the text or otherwise noted as alterations. (20)

I would ask that all of the pages, sections, figures, drawing, tables, etc. be given unique identification, so there would be no confusion between duplicate identifications of items that exist in the various volumes. In particular, I would point out that the Appendices section at the end of the main volume and that many sections of the Appendix - Volume II do not have page numbers. (21)

Similarly, I would request that the 3 volume set be numbered differently. I would suggest that the main volume be known as Volume I, and that Appendix - Volume I & II be known as Volumes II & III, respectively. (22)

Comment Letter No. 41

Conclusion:

Madame Secretary, the proposed Rail project is a terribly expensive way to provide commuters with transportation to and from Boston. The Commuter Bus Alternative can clearly provide essentially the same or better service at a very small fraction of the Rail cost. In addition, Bus is not necessarily confined to being adjacent to the track bed and as such provides current and future flexibility that is impossible for Rail. Other alternatives, such as Park and Ride, Caravan, Ride Sharing, and electronic information transport are other methods that are incredibly more cost effective, if unglamorous.

(23)

Madame Secretary, please do not approve the proposed Rail project.

Madame Secretary, if you absolutely must, would you please strongly consider keeping the Interim Service as is for the time being and supporting the Bus Alternative for communities other than Worcester.

Madame Secretary, I would like to thank you, your staff, and any other readers for taking the time and making the effort to consider my comments.

Most Sincerely,

John Woodward

Please call if I can clarify or expand.

John Woodward (508) 435-5026
Member, Hopkinton Appropriations Committee
54 Lake Shore Drive
Hopkinton, MA 01748-2712

Attachments: Photocopy of Peter Pan newspaper Advertisement
Table I - FY94 MBTA Assessments
Table II - Estimate of potential MBTA Assessments

Comment Letter No. 42

CITY OF NEWTON, MASSACHUSETTS
City Hall
1000 Commonwealth Avenue
Newton, Massachusetts 02159
Telephone: (617) 552-7135 Telecopier: (617) 965-6620

DEPARTMENT OF PLANNING AND DEVELOPMENT
Eugene A. Bober, Director

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

RECEIVED
MAR / 1993
MEPA

Dear Secretary Coxe,

The City of Newton wishes to comment on the Draft EIR for the extension of commuter rail service from Framingham to Worcester (EOEA #9154), as originally filed and later amended by the MBTA.

Neither document fulfills the expectations set forth by Secretaries Tierney and Coxe. Secretary Tierney asks for an alternatives analysis, including the no-build alternative. In the certificate issued on 10/22/92, she says "The analysis should include a discussion of the relative costs of the alternative modes. The environmental impacts and benefits of the various mode alternatives, such as the impacts to air quality, should be compared and discussed in this evaluation". (1)

Such an analysis has not been done.

Trudy Coxe, in responding to the request for project change (filed by the MBTA on 11/29/93), notes on 1/14/94 that the DEIR did not contain a financial analysis of this project, nor was any financial information included in the notice of project change. Many orgainizations have specifically commented on the lack of financial information; the CAC has specifically requested it, and Secretary Coxe has directed the MBTA to supply it.

Such information as the MBTA has provided indicates that the project does not provide significant air quality benefits over the existing express bus service; in fact, at the full build stage the rail is more polluting. It also requires a considerable capital investment, which the no-build alternative did not. This investment would all be from state bonds, the interest on which appears in the operating portion of the MBTA annual budget. The effect of a state funded capital investment on the ability of the MBTA to support increased operations costs has not been discussed.

Comment Letter No. 42

Secretary Tierney was also interested in the overall corridor and right-of-way impacts. The City of Newton is interested in the corridor and the right-of-way also. Three of the existing 11 stations are situated in Newton. None are handicap accessible, or have any other amenities such as signs, closed shelters, or even alighting platforms on the outbound side. Outbound trains must run on the inbound track in order to let passengers off. Conrail, which controls the dispatching on this line, finds it a nuisance to coordinate with what is essentially single track service. In 1988, the first year shown in Table 1.3-3, only half of the inbound trains (7 of 14) stopped at West Newton or Auburndale. Those two stops had 35 and 26 passengers, respectively. By 1992, when all trains stop at all Newton stations, Newton is the source of almost 800 riders (daily boardings inbound only), of which almost half come from West Newton and Auburndale.

(2)

We are concerned that no one has addressed this issue. In the first 2 months of interim service, the schedule was severely disrupted. Will not basic service and full build service lead to further disruption of the schedule downstream to existing riders? Unless the "effective single track" right-of-way is corrected, the pressure from Conrail will be very great to force the MBTA to run closed door service through Newton. The retention of current patrons in the wake of adverse effects of this project has nowhere been considered.

It is difficult to separate the DEIR from an evaulation of the project itself. Both seem to be equally bad.

March 2, 1995

Jody Young
Transportation Planner

Comment Letter No. 43

TOWN OF WELLESLEY MASSACHUSETTS

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R. ARNOLD WAKELIN, JR.
EXECUTIVE DIRECTOR OF GENERAL GOVERNMENT

January 6, 1995

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, MA 02202

RECEIVED
JAN 1 3 1995
MEPA

Dear Secretary Coxe,

Re: DEIR-76-94 Worcester Commuter Rail Extension

Although we support the expanded use of commuter rail services to reduce the dependence on the private automobile, we continue to have concerns about this project.

Inequity in Financing the Project

There is inequity in the financing of the project through assessment against MBTA member communities and not against the communities outside the district, which are actually the beneficiaries of the proposed service. This should be remedied before a capital expenditure of this magnitude is undertaken and before the ongoing operating costs are incurred. (1)

Furthermore, commuter rail serves, or will serve, about 200 communities, about 60 percent of the communities in the state, while only the 78 communities within the MBTA service area are assessed the local share of the commuter rail deficit. The communities other than the 78 within the MBTA district are not paying their fair share. The financial burden falling on the 78 should not be allowed to continue.

Inconsistency with Regional Plan

The outlying communities to be served are advertising access to commuter rail as an economic development incentive for business relocation. Since these communities do not pay for this service, the present assessment structure results in the inner 78 communities subsidizing the export of jobs and housing to outlying communities away from existing population centers and services. This encourages further sprawl, (2)

conversion of open land to development and more demand for installation of costly services in outlying areas. It also makes it less possible for lower income households to pay the commute from inner city residences to these outlying areas. This philosophy is completely inconsistent with the goal of Metro Plan 2000 to concentrate jobs, housing and development near existing population centers, employment centers and public services. (2)

Deficiencies in Analysis

a. There is no analysis of the impact of the project on the ridership and usage of existing stations along the rail line, particularly the three in Wellesley; (3)

b. It appears there has been inadequate evaluation of the impact of changes in current Wellesley commuter rail service in terms of rescheduling of trains or any deletion of trains; and (4)

c. There is no analysis of other impacts of the project on the communities east of Framingham such as changes in vehicular traffic on major streets and parking demand at stations. (5)

Safety Concerns

The Town and the Board of Selectmen are extremely concerned with safety issues along the rail line. This concern is heightened by a recent incident in which a resident was killed when hit by a train. It is believed that there will be even greater concern when additional trains are added. We believe that, as a part of this project, this concern should be addressed particularly in residential areas. (6)

Very Truly Yours,

Barbara C. Shanahan

Barbara C. Shanahan
Chairman

cc: Dan Fortier, MAPC
Representative John A. Locke
Senator Cheryl Jacques
Senator Lois Pines

RAW:tjc

Comment Letter No. 44

Boston
Redevelopment
Authority

MAR 3 1995

Thomas M. Menino
Clarence J. Jones
Marisa Lago

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Attention: MEPA Unit

Dear Secretary Coxe:

Re: EOEA #9154 - Worcester Commuter Rail Extension Project
(Draft Environmental Impact Report)

Pursuant to regulations implementing M.G.L., Chapter 30, Sections 62-62H, the Boston Redevelopment Authority (BRA) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) and submits the following comments.

The proposed project involves the extension of the Massachusetts Bay Transportation Authority (MBTA) Framingham commuter rail line from its present terminus at Framingham to Worcester, with five intermediate station stops and a layover facility in Worcester. Upgrading of the existing Conrail mainline corridor between these two cities also is included in the project. Although the DEIR concentrates its analysis on the environmental impacts of each station alternative and of service along the corridor, the document also examines, as requested in the Certificate on the Environmental Notification Form, the impacts of this additional service on South Station and Back Bay Station in Boston. Our comments on this DEIR will be limited to the relationship of the project to, and the potential impacts on, the City of Boston.

The presently proposed Worcester-Boston schedule calls for a total of 32 train trips per day (eastbound and westbound) under the expanded service scenario (Table 3.4-6). Currently, the MBTA operates a total of six train trips daily between Worcester and Boston (Interim Service) in addition to 26 trains operating between Framingham and Boston (Framingham Line Schedule, page 1-28). Therefore, at this time there do not appear to be any additional train trips proposed along the rail corridor within the city limits of Boston, and consequently there should be no change in noise or vibration impacts. (Due to some minor schedule changes, the timing of train passbys will change in some instances, but this should be inconsequential.)

One City Hall Square
Boston, MA 02201-1007
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Nonetheless, the expanded commuter rail service could require the use of longer trains or different equipment than is now being used and potentially, if the service is highly successful, additional daily train trips, and therefore could increase the noise and vibration impacts along the entire Boston-Worcester corridor. The ENF Certificate acknowledged the concern of the City of Boston that this expanded service could result in increased noise and requested an examination of the significance of the impact within Boston and the need for mitigation. However, the DEIR did not contain any analysis for Boston but only evaluated the potential noise (and vibration) impacts in the Framingham-Worcester corridor. Furthermore, there is no analysis of the existing noise and vibration levels along the existing right-of-way to determine whether current levels are excessive and should require mitigation. We again would like to express our concern and request that this analysis be included in the Final EIR. Should current levels be found to exceed acceptable standards, then we would expect the MBTA to propose and commit to appropriate mitigation measures.

(1)

In our comments on the August 1993 Draft EIR for this project (which was subsequently withdrawn by the MBTA), we raised the issue of interconnection of the Worcester extension to one or more stations along the proposed circumferential transit line that would connect the existing radial transit corridors outside Boston's central business district. Since the DEIR was withdrawn, our comments did not receive a response. We would like to reiterate our comments here.

Boston has targeted major economic growth initiatives within a short distance from the Framingham commuter rail line. Among these initiatives are the growth plans in the Longwood Medical Area, the redevelopment of the Sears Building on Park Drive, medical developments on West Boylston Street, and Boston University developments at the Kenmore Square end of its campus. Each of these proposals falls within the circumferential transit corridor defined in the Commonwealth's PMT. This corridor is the location of other major city initiatives, including its Empowerment Zone.

The transit mode share of each of these proposals could be significantly improved if the Framingham line provided service through a station located in the Kenmore Square area. The present Yawkey Station, which provides a stop only for baseball patrons, provides a glimpse of the potential of such a station. The Longwood Medical Area Service Corporation (MASCO) has indicated a strong desire to provide shuttle service from such a station.

(2)

We therefore request that the FEIR develop a proposal for a mid-term station and evaluate the benefits and impacts of such a facility. As part of this assessment, we suggest that the study consider the potential of linking this station to the circumferential bus service recently established as a short-term circumferential service improvement in the corridor.

The MBTA will shortly embark on a Major Investment Study of mid- and long-term circumferential transit service improvements. As part of this study a potential fixed

alignment circumferential service will be evaluated. This study can determine the optimum long-term location for a Framingham line station with connections to a more permanent circumferential service.

Section 19.0 of the DEIR discusses pedestrian traffic impacts at South Station and Back Bay Station as a result of the additional passengers generated and concludes that there will not be a significant impact. Existing conditions are only generally summarized. However, there is no documentation indicating existing conditions and LOS levels nor any documentation supporting the conclusions.

Similarly, Section 19.0 also discusses approach and platform track capacity at South Station and again indicates that the proposed Worcester service would not have an adverse effect, citing an operation analysis. Again, neither this analysis or any other supporting documentation was included. (3)

Accordingly, we request that this information, as well as more detailed analysis, be included in the Final EIR. In addition, the Final EIR should be more specific with regard to the mitigation measures which the MBTA will implement to minimize any adverse impacts to pedestrian and vehicular traffic from the additional commuters which will make use of South Station and Back Bay Station.

Sincerely,

Brian DeLorey
Assistant Director for
Economic Development

cc: Andrew D. Brennan
Manager of Environmental Affairs
MBTA

Comment Letter No. 45

City of Boston
The Environment
Department

THOMAS M. MENINO
Mayor

Lorraine M. Downey
Director

Boston City Hall Room 805
Boston, Massachusetts 02201
617/635-4416 or 635-3850

March 8, 1995

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge St. 20th Floor
Boston, MA 02202

Attn: Nancy Baker, MEPA Unit
RE: EOEA #9154, Worcester Commuter Rail Extension, Statewide

Dear Secretary Coxe:

The City of Boston Environment Department has reviewed the Draft Environmental Impact Report (DEIR) for the proposed project referenced above and hereby submits the following comments in response:

The proposal described in the DEIR will not add any new train trips between Framingham and Boston, so additional noise and vibration impacts in this portion of the corridor should prove insignificant. However, a highly successful service could generate the demand for more trains, which ultimately could produce additional commuter train trips inbound of Framingham. Such expanded service would raise noise and vibration levels along the immediate corridor. The Environment Department recommends that the MBTA be required to submit a Notice of Project Change if at any time the MBTA proposes to increase the number of commuter train operations on the Framingham-Boston portion of the corridor above the current daily number of 32. (1)

The existing 32 daily commuter trains produce noise and vibration impacts on the Framingham-Boston corridor. The DEIR proposes no mitigation for the existing impacts, only discussing mitigation for the portion of the corridor not currently exposed to 32 daily commuter train trips. The Environment Department does not view this mitigation emphasis on the Worcester-Framingham portion of the corridor as fair to residents along the Framingham-Boston portion of the corridor, who already live with noise and vibration roughly equal to the levels which will require mitigation along some of the new portions of the line. The FEIR should include discussion of existing train noise (2)

(2) and vibration levels, and should propose a more equitable program of mitigation focusing on corridor-wide noise levels.

(3) The MBTA intends to use the proposed Federal Transit Administration (FTA) criteria for determining exposure to "adverse noise impacts," and hence eligibility for mitigation funding. However, the City of Boston has consistently objected to the proposed FTA criteria as unfair to urban areas, because of the sliding scale used to determine "adverse impact." Rural and suburban areas typically qualify for noise mitigation at much lower absolute noise levels than non-qualifying urban areas already exposed to high levels of noise. The Environment Department has spelled out its objections to the proposed FTA criteria (and other problems relating to noise and vibration impacts along rail corridors) in a BED memorandum to MEPA on the Northeast Corridor project (EOEA #9134). A copy of that memorandum is attached to this comment letter, and is incorporated herein by reference. The FEIR should include responses to the relevant portions of this attached memorandum.

(4) The Environment Department recommends that the MBTA adopt a uniform performance standard of 65 dBA L_{DN} for residential areas along rail corridors, and provide mitigation wherever train-related noise exceeds this level. For areas where existing noise levels exceed 65 dBA L_{DN}, the Environment Department recommends adopting an "ambient + 2dBA" performance standard to determine adverse noise impacts. The FEIR should commit to this approach on a corridor-wide basis. Similarly, the Environment Department recommends that the FEIR apply a reasonable corridor-wide standard to vibration mitigation, and commit to rectifying existing deficiencies, not simply minimizing new problems.

(5) The Environment Department requests additional information on pedestrian traffic impacts at South Station and Back Bay station. The DEIR offers only a general summary of existing pedestrian conditions, and offers a cursory conclusion that the proposed project will not produce unacceptable impacts. The DEIR does not include any quantitative analysis of existing conditions, or documentation to support the finding of no impact. The FEIR should provide more quantitative and verifiable pedestrian information for both Back Bay and South Stations.

Within the City of Boston, the Worcester commuter rail line passes close to several major employment centers, including the Longwood Medical Area, the proposed Sears Building redevelopment, and the eastern portion of the campus of Boston University. Each of these areas also falls within the area defined in the Commonwealth's PMT as the circumferential transit corridor. The developments in these areas would all experience enhanced transit mode share if the Worcester/Framingham commuter rail line provided a direct connection to the proposed circumferential transit service in the vicinity of Kenmore

Square. The FEIR should take advantage of this planning opportunity by developing a proposal for linking permanent circumferential transit service with the Worcester line. The FEIR should also investigate opportunities for linking the Worcester service with the interim circumferential bus service recently established in the area. (6)

The Environment Department looks forward to continued improvement in the proposed Worcester Commuter Rail Extension through the ongoing environmental review process.

Sincerely,

Lorraine M. Downey
Director

LMD/AP:ap

cc: Andrew Brennan, MBTA

attachment

Comment Letter No. 46

2.61 M5

February 17, 1995

Ms. Trudy Coxe
Secretary of Environmental Affairs
Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Room 2000
Boston, MA 02202

RECEIVED
FEB 22 1995
MEPA

RE: EOEA 9154
Comments on the construction of a commuter rail station in the Town of Millbury as part of the Worcester commuter rail extension project.

Dear Secretary Coxe:

Two different sites have been proposed for the construction of a commuter rail station in the Town of Millbury, the Rt. 122 site and the Rt. 20 site.

Please take note from an environmental perspective that the Rt. 20 site is essentially inaccessible by bicyclists or pedestrians as due to Rt 20's status as a four lane highway. (1)

Also please take note that the Rt. 122 site is in a residential neighborhood and will by its very nature, allow local citizens to walk or to bike to the station. (2)

Please support those citizens, who in the interest of clean air and health, will leave their automobiles behind for the commute to Boston and please support the construction of a commuter rail station off of Rt. 122 in Millbury.

Very truly yours,

Brennan F. Wall

Brennan F. Wall
62-A Oakpond Avenue
Millbury, MA 01527

Comment Letter No. 47

SCOTT ROSSITER
TWO STONEWALL DRIVE
GRAFTON MA 01519
508-839-9686

February 12, 1994

RECEIVED
FEB 17 1994
MEPA

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street/Room 2000
Boston MA 02201

Attention: MEPA Unit

Re. Worcester Commuter Rail Extension Project, EOEA #9154

Dear Secretary Coxe:

I wrote you in November regarding the original DEIR for the above mentioned project and although the new report at least recognizes the issue of traffic changes if adjacent stations are not constructed it does not address the issue.

On page 13-15 they estimate that if a station is built only in Grafton there will be 444 cars a day trying to park at a station with 250 spaces. There is no plan to expand the station to a regional station and no traffic studies have been done. (1)

This report is still inadequate and needs further revision.

Very truly yours,

Scott Rossiter

Comment Letter No. 48

3/6

NB

February 24, 1995

RECEIVED
MAR 7 1995
MEPA

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Dear Secretary Coxe,

Over the past few years, I have served both on the Westboro MBTA committee and the CAC. I have spent several hundred hours looking at sites, researching commuter routes, reviewing paperwork and attending meetings regarding this project. While there are many areas of the EIR to comment on, I have concentrated on the local Westboro issues of a Rt. 495 regional station and the proposed Westboro station.

Regional Station Comments:
After walking all of the proposed sites and studying all of the material available on this issue, I have come to the conclusion that there are several reasons other than cost that make building a regional station at Rt. 495 impractical:

1. Environmental Problems - These problems have been well documented and need no further elaboration here.

2. Highway Access - After looking at several documents regarding the proposed installation of a ramp at Fruit Street in the late 1970's, there appears to be several regulations at a Federal level which would prohibit the construction of a new ramp system to access a regional station at Rt. 495.

3. Conrail Auto Facility - This presents a formidable engineering problem due to the number of sidings that exist for backing in the trains carrying the cars. When these trains are being unloaded, it ties up one of the two mainline tracks for 1/4 - 1/2 mile and limits how a station could be configured in this area. There is also a rail siding for Cumberland Farms which could present a logistical problem.

4. Commuter Driving Habits - After studying commuter driving patterns for over two months, it became clear to me that the majority of Boston bound commuters from the local towns are not using Rt. 495. Commuters from Marlboro, Hudson and Southboro use Rt. 85 and Rt. 9 to gain access to the Turnpike at the Sheraton Tara ramp. Commuters from Westboro generally use Rt. 9 to this same ramp. Commuters from the

Comment Letter No. 48

Millbury, Holliston and Hopkinton area follow Rt. 85 to Woodland Road to Rt. 9 to the same Sheraton Tara Ramp. In summary, most commuters East of Rt. 495 would have to change their commuting patterns and drive West to catch a train going East.

(1) The reality of the situation is that the Southboro station with it's excellent access to Rt. 85 and Rt. 9 will become the defacto regional station the minute it comes online. I believe that both lots at Southboro will be completely full from day one and the overflow traffic will work its way a few miles East to Ashland and fill any available space there.

(2) The only way to reduce the impact on Southboro and Ashland is to provide another station location that would be attractive for the Marlboro and Hudson commuters using one of the old spur lines that run up through those towns. Another alternative might be a park and ride facility using buses to bring in passengers from Marlboro and Hudson on a schedule co-ordinated with the train.

Westboro Station Comments:
The proposed station at Smith Valve/Otis Street will at best, serve only a small portion of Westboro residents. Most of these residents are located on the South and West sides of Town and generally already use Mill Road and Fisher Street to gain access to Rt. 9, bypassing the traffic blockage at the rotary.

(3) The main benefit of this station is to the surrounding towns of Shrewsbury, Grafton and Northboro. Since the Westboro station would be providing a service mainly for other towns, it is only fair that some sort of mitigation should be offered. At a bare minimum, side street improvements and side walks for Fisher street should be provided. If the MBTA does not provide Westboro with some mitagation, I would vote against having this station come online because of the limited benefit to its residents.

Summary:
(4) As traffic problems in Boston worsen, commuters will be looking for alternative mass transit options. The proposed main line stations between Framingham and Worcester will only serve part of that need. Other alternatives such as commuter rail service on spur lines, bus service, park and ride lots and HOV commuter lanes on the Turnpike should all be explored as part of a coordinated transportation plan.

The MBTA needs to be more innovative in its approach to mass transportation. To date, most of the proposed projects have been very capital intensive and heavily subsided. They should look at the example of Massport which started the very successful Logan Express bus on a small budget with a low tech approach of a trailer as an office in an unused parking lot.

The MBTA should also be more responsive to the questions and concerns of the local communities. Basic questions such has "How much will the station in Westboro cost taxpayers in assessment fees?" remain unanswered. Or the classic statement that "no traffic mitigation is needed since the intersection is already at a level of service D". It is because of issues like these, that MBTA credibility at the local level has gone down, not up over the life of this project.

Comment Letter No. 48

The MBTA must go beyond the scope of the EIR and genuinely try to address the questions and concerns of the community. Certainly you will not please everyone, but much will be accomplished if the MBTA at least makes an attempt to provide answers instead of responding with a stony silence.

The alternative is that the local towns will reject the proposed stations and the service will remain as it is today, a non-stop from Worcester to Framingham.

Sincerely,

Larry Gomes
10 Old Flanders Road
Westboro, MA 01581

Comment Letter No. 49

EOEA # 9154 MEPA 3/8/95 page 1 NB

Louis & Maureen Jankauskas
99 Fisher Street
Westborough, MA 01581

The Honorable Trudy Coxe
Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

February 21, 1995

RECEIVED
MAR 8 1995
MEPA

RE: Environmental Impact Report EOEA # 9154

Dear Ms. Coxe:

We are writing in regard to the DRAFT Environmental Impact Report EOEA # 9154 (DEIR) for the Worcester Commuter Rail Extension Project. We have lived at 99 Fisher Street in Westboro for over 18 years and are abutters to the proposed station on Smith Valve Parkway. In general, the DEIR is improved compared to the previous draft which had to be withdrawn due to its deficiencies in many areas. However, this present version is also lacking in many of the design details and its discussion of several environmental issues that we will address below. These deficiencies make it very difficult to assess the stations impact. For example, the existence of the high power lines adjacent to the Smith Valve Station site is not even mentioned in the DEIR. Also, tables justifying the project (Tables 2.3-1 and 2.3-3) have inconsistent data for 1980. This, coupled with our observation that the MBTA trains providing the interim service are nearly empty, leads to the conclusion that the project is being oversold by the MBTA.

We have read the DEIR and will address many of our concerns. These include:

- Station Siting
- Station Design and Construction
- Noise and Vibration
- Safety and Liability
- Security

1) Station Siting

Originally, the Westboro Station was proposed to be located on Fruit Street, but due to local opposition, other site's were evaluated and the Smith Valve Site selected. Use of the downtown station was deemed unworkable due to Site costs and increased traffic on East Main Street, even though this site would have the most favorable impact on revitalizing the Westboro downtown area. In the 18 years that we have lived in town, the traffic on East Main Street has always been horrible, but this has not stopped the construction of the Willows, the Fallon Clinic, the Jewish Center, Downtown Crossing , the new Post Office, etc. and the development of the Rogers property and the Senior Citizen housing. Due to the train schedule, most of this traffic would occur prior to Westboro's "Rush Hour" in the morning and after it in the afternoon. Based on the schedules in the DEIR only two trains in each direction would be during peak traffic hours in Westboro. The cost of the site for the MBTA should not be a factor in Westboro recommending a station site. Westboro should choose a site based on what's best for the town and the town's residents. Selecting the Smith Valve station site with a projected ridership of 22 Westboro residents, the loss of taxable property, and no revitalization of the downtown area, does not seem to be in the town's or the state's best interest.

Also, the Smith Valve Station site is within a few miles ride to the Grafton Station site. Why have two stations serving the same potential passenger area?

In summary, we believe that a small downtown station, geared to Westboro residents, is in the town's best interest and should be evaluated and proposed to the MBTA. Based on the DEIR, page ES-8, "the MBTA will construct only intermediate stations which receive the host community's approval". Westboro should reject the Smith Valve Station site, should recommend the downtown site, and let the MBTA decide if the downtown site is financially viable. (1)

2) Station Design and Construction

There are several factors which make the construction of the Smith Valve Station, as proposed in the DEIR, unworkable.

First, the station platform, as proposed, would be within 1 to 2 feet of the property line with our property and other Fisher Street residences on the south side of the station. I don't see how the station can be constructed without access to abutting properties and without filling and grading of these properties. The tracks are at points elevated approximately 15 feet above our property and the property at 101 Fisher Street. How to construct the 800 foot platform, which is over 21 feet from the track center, without filling on these properties, has not been addressed. Also, with the town's 15 feet set back zoning requirement, the construction of the station does not conform to the town zoning by-laws. As an abutter I am against any relaxation of this set back requirement. Referring to DEIR Figure 3.2-3, page 3-17, this limited land availability would prohibit landscaping, sound barriers, or other station improvements without encroaching on abutting property. Although the MBTA has stated that no property taking is required, I am not convinced that the station can be constructed and the appropriate sound barriers and landscaping developed on the limited rail property available on the south side of the tracks. (2)

Second, the New England Power company has an easement right along a 70 feet wide section of our property. This easement prohibits the construction of fences and allows the New England Power Company to cut back trees and other plant growth. This easement is in direct conflict with the desire of the abutting property owners for sound abatement measures. The DEIR never mentions the existence of the power lines in addressing the station construction. The only way to construct a station on Smith Valve with proper noise abatement for the south side homeowners and pleasurable landscaping is to relocate these power lines to the North side of the tracks. Relocation of the power lines must be a part of any Smith Valve Station baseline. (3)

3) Noise and Vibration

It has become clear during the Interim Service period that the MBTA trains are the most annoying of all trains, including the Conrail freight trains. The MBTA trains emit a low frequency pulsating sound and vibration. Also, contrary to the DEIR, page 14-27, which states "Because of slow train speeds near stations, the potential for noise and vibration impacts from train operations are at a minimum compared to other segments of the right-of-way" our experience has been that the slow train vibration is just as severe as the fast train, but the duration of the vibration is longer. Figure 7.3-2 (page 7-15) shows that the trains sound level only decreases slightly with increased speed.

Comparing Figure 7.3-2 with the acceptable noise criteria in Figure 7.3-1 shows that the MBTA trains (at 50 feet and 25 mph) are about 13 dB (20 times) above the Unacceptable Housing Environment level and 23 dB (200 times) above the Normal Acceptable Housing Environment. Since the DEIR does not present how sound energy falls off with distance, I will assume that it falls off with the square of the distance. With our home located approximately 150 feet from the tracks (a factor of about 3 times 50 feet), this relates to a decrease of 10 dB resulting in exceeding the Unacceptable Housing Environment by 3 dB (a factor of 2) and exceeding the Normal Acceptable Housing Environment by 13 dB (a factor of 20). Based on this analysis noise abatement is required for the Fisher Street neighborhood even for the present Conrail and Interim MBTA service.

With 19 stops per day (pages 3-43 to 3-46) during the basic service (at 2 minutes each), the noise and vibration will effect the Fisher Street neighborhood for 38 minutes a day, mostly early morning (6 AM) and during the evening. For the expanded service this will increase to 62 minutes a day with trains stopping up to midnight. Based on even the basic level of service it's clear that significant noise and vibration abatement for the Fisher Street neighborhood is required. In fact, this abatement is required even if the station is not built at Smith Valve. (4)

The DEIR is severely lacking in its approach to noise and vibration abatement. It states (page ES-17) that "the MBTA has also recently adopted the policy of expending up to 2 per cent of project construction costs for noise and vibration impact mitigation, but only where there is a clear benefit from the mitigation cost incurred." Based on the total project cost of $112 M (page 3-49) of which $78 M is designated as Construction, this provides, according the MBTA's policy, up to $1.56 M for noise and vibration mitigation. However, the MBTA cost estimates (page 7-83) state that "The total length of noise barrier required to mitigate noise impact is estimated to be 1,200 linear feet for basic service and 16,950 linear feet for expanded service at estimated costs of $384,000 and $5,424,000, respectively." It's clear from these cost estimates that funding to provide sufficient noise and vibration abatement is not being allocated by the MBTA. (5)

Furthermore, the DEIR states that (page 7-83) "Basic commuter rail service is projected to result in noise impact to 6 residences in Grafton. Expanded service, with a greater number of trains per day, is projected to result in noise impact at 92 residences along the corridor," The DEIR doesn't indicate why 20 trips per day with basic service impacts only 6 residences, but expanding to 32 trips per day impacts 92 residences. Our experience with the interim service indicates that noise abatement is required NOW, basic service will only make it worse and the expanded service, with stops at midnight, will be intolerable.

It's clear that this project requires a comprehensive noise and abatement plan that is an integral part of the project; at present this is not the case. The MBTA's tendency to do noise and vibration abatement "on the cheap" is unacceptable and must be rejected by the Selectmen of the Town of Westboro. The basic Smith Valve Station plan must include relocating the power lines to the North side of the tracks, the construction of a 15 to 20 foot sound barrier and the development of a landscaped buffer area between the station and the adjacent south side property. Otherwise the station will always have a significant negative impact on property values of the station abutters. If the MBTA is not prepared to allocate funds and resources to provide a minimum impact on adjacent residences, then the Worcester Commuter Rail Extension Project should be terminated.

4) Safety and Liability

The DEIR provides only a superficial discussion of safety issues associated with this project. It addresses the issue of pedestrian safety by (page 7-82) "pedestrian crossing of the tracks will be discouraged by construction of inter track fencing through each station site, and by construction of pedestrian bridges over the tracks to connect station platforms to the parking facility." Other safety issues exist that are not addressed by the DEIR.

The power lines adjacent to the Smith Valve station site emit RF radiation. ANSI standard C95.1-1991 addresses the allowable RF radiation limits for informed (electrical workers) and non-informed (commuters) persons. The DEIR did not provide any RF measurements to assess the impact on passenger safety and to assess whether RF safety limits would be exceeded. The location of the pedestrian bridge adjacent to high power transmission lines must also be addressed from both possible electrocution dangers and RF radiation hazards. (6)

Another safety issue at the Smith Valve station location is the proposed 800 foot platform with a (page 14-34) "covered canopy about 150 feet in length" as shown on page 3-17. This canopy will prevent pedestrians from walking or falling off the platform. No such protection is mentioned for the remaining 650 feet of platform. With the station platform at some points 15 feet above the adjacent property, severe injury could result. As the pedestrians will be falling onto our property, this safety issue impacts our liability. In fact, there is no mention of any attempt by the MBTA to restrict pedestrians from crossing our property to catch the train or from walking off the platform onto our property. (7)

5) Security

The DEIR makes no mention of station security. With the present problems at the Fisher Street bridge due to the remoteness of the site and the infrequent police patrol, this area is susceptible to security problems. The proposed pedestrian bridge could easily become a gathering place and could increase security problems in the vicinity of the station. This issue must be addressed by the MBTA prior to the station construction and in coordination with the Westboro Police. (8)

In summary, we believe that the selection of the Smith Valve Station site is not in Westboro's or the Fisher Street neighborhood's best interest. Furthermore, the DEIR fails to adequately address the basic issues of site construction, noise and vibration abatement, safety, liability, and security. Until these issues are resolved to the satisfaction of the station abutters, the MBTA must not proceed with the development of the Smith Valve Station.

Sincerely,

Lou and Maureen Jankauskas
and the following residents that oppose the Smith Valve Parkway as a site for the proposed MBTA Station based on the concerns expressed in this letter.

Comment Letter No. 50

February 24, 1995
7 Chestnut Street
Westboro MA 01581

The Honorable Trudy Coxe
Office of Environmental Affairs
100 Cambridge St
20th Floor
Boston, MA 02202

RE: EOEA # 9154

Dear Judge Coxe:

I am writing to you to voice my concern about the MBTA's intention to build a train station on Smith Value in Westboro. The residental roads that lead to Smith Value are already heavily traveled with traffic. Why does the station have to be located so close to one of the worst intersections of RT 9? I go through the Otis Street and Rt 9 intersection each morning. I question if the intersection could handle the additional traffic of people from Shrewsbury and Northboro. (1)

I do not understand why MBTA is against a regional station located on one of the main highways of RT 495 or RT 9. This would provide the transportation for the surrounding towns and not cause a hardship to the Westboro residents. It would also be an asset to the many businesses located on the main highway. (2)

Sincerely,

Mary Fisher & Family

CC:
Selectmen's Office

Mary Cullen

Comment Letter No. 51

Reason: Feb. 20, 1995

Environmental Report EOEA #9154

I have lived on Fisher St all my life. The train borders the backyard of the home I grew up in. My mother still lives there and I live across the street. Although I see a growing need for train service I see a larger need not to have it located on Smith Valve. This section of "neighborhood" will definitely be affected. We knew the train track and trains would be apart of our lives but not a station. PLEASE help us in ~~relocating~~ relocating the "site". Thank you

Mary Cullen 90 Fisher St, Westford

1

Comment Letter No. 52

Stephen & Charlene Henry
93 Fisher Street
Westborough, MA 01581

24 February, 1995

RE: EOEA #9154

Dr. Ms. Coxe,

This letter is regard to the proposed building of the MBTA Station on Smith Valve Parkway. As a TAXPAYING residents of the town of Westborough and the state of Massachusetts, we are highly opposed the building of any facility of any kind on the proposed site on Smith Valve Parkway the increases the already high noise pollution that we must indure on a daily basis from trains running in our back yards. (1)

The inability of Con Rail, AMTRAK, and now the MBTA to properly maintain their diesel engines so that the residents who live along the tracks do not have to put up with the noise and smell has left us wondering what will happen if the MBTA is allowed to build a station in our back yard. The already too noisy and loud trains that rumble by in the middle of the night waking the neighborhood and shaking our homes has gotten extremely out of hand. Now you want us to let you add to this by allowing a station to be built in our back yards. What is going to be done about the noise? Can you assure us that all proper safety precautions will be taken? Can you guarantee that our homes will not have to suffer any more vibrations from poorly maintained equipment?

These are just a few of the items that need to be addressed. We would also like to know who is going to provide security in the neighborhood, and what is going to be done with the increasing amount of traffic? (2)

The traffic problem at the intersections of Otis Street and Fisher Street is already a problem, that has received little or no attention of the local police department. Now you are suggesting that we tax the extremely dangerous intersection with even more traffic. It has become ever more dangerous to pass along this intersection now with confronting people who flagrantly violate the stop sign, and you expect us to put up with more traffic. Or are you planning to spend more of our hard earned tax dollars to fix the bridge on Fisher Street and dump several hundred more cars a day in our neighborhood. Traffic in the area due to the high volume of cars from Bose and ASTRA already try the patience of people trying to get in and out of our neighborhood, do you suggest that may just add more fuel to the fire? (3)

And what about security? What are the guarantees that our homes will remain safe, or are you proposing that we put that extra burden on our local law enforcement agency? Maybe the MBTA is proposing that we spend our tax dollars and hire more MBTA cops to sit in our backyards and protect our rights! (4)

But these are not our only concerns. What about the power line that are just about in our backyards now? It is my understanding that in order to properly put it the needed lines and tracks, that these lines will have to be moved. So how much farther on our (5)

property will they go. I'm sure if any of the families living in the neighborhood wanted to live with high tension wires in their backyards that they could have purchased land with the lines already humming above their heads.

These are just some of the concerns that have come up in conversation with our neighbors. Isn't it time that you as an "Elected Public Servant" started to pay more attention to the people who put you into office? Or do you respond more kindly to "Big Business" because they put more dollars in your election coffers. We think its time to start listening to the middle class of the American public. We are sick and tired of listening to you and other politicians tell us what we want to hear as you call us stupid behind our backs, telling Big Business that they can do whatever they want.

In closing, we would like to go on record as saying that we, and the rest of the people in our neighborhood are extremely opposed the current sight location for the MBTA station, and ask that you take us seriously and relocated the afore mentioned sight to a place that is not already stressed by the noise and vibration pollution caused by too many trains a day. It has been suggested that a sight at the junctions of Rts. 9 and 495 might be more suitable for this project for numerous reasons.

Thank you for your time and understanding in addressing this problem.

Sincerely,

Stephen & Charlene Henry

Comment Letter No. 53

Mr. and Mrs. Brian Kennedy
139 ~~130~~ Fisher Street
Westboro, MA 01581

March 7, 1995

The Honorable Trudy Coxe
Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, MA 02202

RE: Environmental Report EOEA #9154

TO: The Honorable Trudy Coxe:

We are writing you because we have a concern regarding the MBTA train station on Smith Value property in Westboro, MA. We are not against rail service. We are concerned that the neighborhood roads are too narrow for the traffic that it will bring. (1)

We also don't think that the report was very thorough as it didn't take into consideration the developing that will be happening in the immediate area. There are 120 apartment units and 3 major housing development projects (2 are located in Shrewsbuy, which abuts this area) all within 1/2 mile from the location. The Deir does not allow for widening of the roads or providing sidewalks. This concerns us as there is already a problem with the buses running our children to and from school. This will effect both towns of Westboro and Shrewsbury. Many people already use the narrow back roads for short cuts and it will only increase with the station. We are concerned about the safety of our children and others. There was a recent death due to a pedestrian walking along Fisher Street. We don't think the station should be put there if it will cost even one life. (2)

The best thing for Westboro would be to have a regional station at Rt. 495 and Rt. 9. These roads could handle the traffic and there wouldn't be a safety issue. What about the old station downtown Westboro? Local businesses and senior housing could benefit from the station being located there. What about the power lines at Smith Value location? There is an easement that prevents any building or planting on this area. (3)

In closing, again we state that we don't believe that the report has taken into consideration the future housing development, the narrow roads that will be used for short cuts and the safety of the citizens. We believe that there are other alternatives in the location of this service that would benefit more.

Thank you for listening.

Brian and Antoinette Kennedy

cc: Board of Selectmen Westboro
Board of Selectmen Shrewsbury
Governor Weld

Comment Letter No. 54

3/3/95

MBTA
3/7/95

NB

TRUDY Cofe
DECRETARY, ENVIRONMENTAL AFFAIRS OFFICE
100 CAMBRIDGE ST., 20th FLOOR
BOSTON, MA. 02202

RECEIVED
MAR 7 1995
MEPA

Re: PROJECT # EDEA

Dear Ms Cofe,
I believe it important for the citizens of Westboro to have the opportunity to use the MBTA Framingham - Worcester Commuter rail service. This would be a tremendous value for citizens working or visiting Boston both for themselves and the environment, i.e. less cars on the road.

I am requesting that you support a railroad stop in Westboro on South St. This in no way interfere with traffic in and out of the town of Westboro. (1)

Sincerely
Maria Guellon

Comment Letter No. 55

NG

15 Maynard St
Westborough, Ma 01581

March 6, 1995

Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge St. 20th Floor
Boston, Ma 02202

RECEIVED
MAR 7 1995
MEPA

ATTENTION: MEPA UNIT
RE: EOEA #9154

Dear Secretary Coxe,

For the past twenty-two years, we have owned and operated a business in the Town of Westborough and make it our home. We have raised a family here, are community active and have been life-long residents of the Worcester area. We resided in the City of Worcester for nine years and through our business and community involvement feel we are familiar with the demographics of Central Massachusetts.

The Legislature has authorized a 495 regional station study. This study should be completed before the construction of any of the 5 local stations. (1)

It is unconscionable for the MBTA to waste any more taxpayer money proceeding with this proposed project before completing a regional study and working with the Joint Transportation Committee to develop an equitable funding system.

The success of the interim service from Worcester proves there is a need for a regional study to be "fast tracked". The MBTA estimated that patrons for the Worcester extension would be drawn from 6 miles or fewer from the rail line and not much further than 10 miles away. (Ref: DEIR Sec. 2.2 & 5.2). Also, the MBTA remains steadfast in their position that "people will not travel west to go east."

A Telegram & Gazette, 2/25/95 story regarding Worcester interim service quotes James Eng, Project Manager: "A few riders come as far away as Springfield to take the train. People are coming from Lancaster Princeton, Webster and from towns to the east." Clearly, this is in conflict with the MBTA's DEIR conclusions.

The MBTA has continues to state that "a regional station is a long term goal". The court agreement with Conservation Law Foundation on the Central Artery commits the MBTA to study the feasibility of the Worcester Commuter Rail Extension by December 31, 1995, and if found feasible, to commence construction by December 31, 1996.

If the goal is to get 2,000 people out of their cars by 1996, then the Bus Alternative (DEIR ES 10) should be implemented. The "Park & Ride" locations in Millbury and Westborough have not been factored into or even acknowledged as part of the "short term" 1996 commitment. (2)

If the goal is for a viable cost effective commuter rail system benefiting the entire Commonwealth, then the MBTA must be directed to complete a regional station study NOW.

This project as proposed is filled with contradictions, misrepresentations, and evasiveness.

Interim service from Worcester now is a 60 to 70 minute ride to Boston. The Draft states it will be a 60 to 70 minute ride from Worcester to Boston including the proposed 5 intermediate stops. (3)

The MBTA has the capability and has been requested to run models for a regional ridership projection without the five local stations, BUT HAS NOT.

Comment Letter No. 55

(4) The Westborough Board of Selectmen oppose any station site within the town due to unacceptable traffic patterns; but will support a 495 regional station. THE DRAFT STATES THAT THE SMITH VALVE PARKWAY SITE WAS "CHOSEN" BY THE TOWN.

The MBTA was provided with a proposed work program regarding assessments, BUT THE MBTA REFUSES TO DO MORE THAN TO CITE THE EXISTING LAW.

Elected officials, State Agencies, and Authorities should be able to collectively create a workable solution.

(5) A cost comparison of regional vs five local stations needs to be analyzed taking into consideration the mitigation costs for the five towns involved has not been defined nor has a dollar amount and where the money will come from been disclosed.

(6) There are tremendous traffic and safety impacts for the towns of Westborough and Southborough at the proposed station sites. "MBTA misses entirely the local viewpoint. We want a regional station INSTEAD of local stations" Ref: Town of Southborough comments on DEIR.

(7) The "major route" access referred to by the MBTA to the Westborough site is Route 9 and Otis St. This intersection is LOS F. Commuters coming from Northborough and Shrewsbury will avoid this intersection and use Rte. 135 to Maynard and Fisher Streets.

(8) The two Schools on Fisher St. have a total enrollment of 693 fifth through eight graders. Students walk from all neighborhoods in a 1 1/2 mile radius on streets with no sidewalks.

(9) "Contrary to what the MBTA projects, local travel pattern to the Smith Valve site are most likely to occur over residential neighborhood streets". Ref: Westborough Town Planner comments on DEIR. These streets are narrow winding roads bordered by stone walls and massive trees. Arch and Maynard Streets narrow to 1 1/2 lanes under railroad bridges that the MBTA has looked at and will not consider widening.

(10) The Draft fails to acknowledge Westborough's planned projects on Rte. 9 and growth in housing and commercial development nor has the Town Planner been contacted. Access to the proposed Smith Valve Parkway site will have a serious impact on the neighborhood streets of Arch, Gleason, Maynard, School, Church, Fisher, and Mill Rd.

We stand with The Westborough Board of Selectmen, Planning Board, School Committee, Police Department, Department of Public Works, and Historical Commission in opposition to the Smith Valve Parkway site.

We support the Towns of Westborough and Southborough, The Westborough/Northborough Area Chamber of Commerce, Metro West Growth Management, and the attached 300 signature Citizen's Petition for a 495 regional station study.

We appeal to your expertise in making this a cost effective viable commuter project.

Sincerely,

Judith M. McCabe

E. Thomas & Judith McCabe

CC: Westborough Board of Selectmen
Senator Robert Durand
Senator David Magnani
Representative Ronald Gauch
Citizens' Advisory Committee
Southborough Board of Selectmen

Comment Letter No. 56

RECEIVED
MAR 8 1995
MEPA

318195

March 5, 1996

to: Secretary of Environmental Affairs
Executive Office
20th Floor
100 Cambridge St.
Boston, MA 02202

to the Honorable Trudy Coxe,

A number of editorials in our local Westboro paper have prompted me to write this letter. The editorials urge residents to support the regional MBTA station and to oppose a local station. (1)

I am in favor of LOCAL stations as originally proposed. A few years ago I was looking forward to being able to take the train to work. It would have been convenient as I live very close to where the proposed Southboro station is.

I cannot say that I am not unbiased when it comes to a regional station, because it is in MY backyard. Living where I do, I see gridlock daily on Rt.495/Rt. 90 which backs up to Rt. 9. Attempting to weave a train station into this will not be easy. Highway accidents are frequent. In my neighborhood land misuse (wetlands) has occurred and companies have been fined.

I cannot protest improvements in public transportation which are needed, however a train station should serve the community. The MBTA trains are not noisy and dirty as many residents claim. I am hopeful that the MBTA will not be derailed and that a workable solution is found.

Thank you,

(please withhold name)
Sally Tajiani
9 Washington St.
Westboro, MA 01581
508 366 4399

Comment Letter No. 57

318 NB

20 Maynard Street
Westnorough, MA 01581
March 5, 1995

The Honorable Trudy Coxe
Office of Environmental Affairs
100 Cambridge Street 20th Floor
Boston, MA 02202

RECEIVED
MAR 8 1995
MEPA

Re: Environmental Report #9154

Dear Ms. Coxe:

As residents of Maynard Street, Westborough, we are disturbed by the impact the proposed Smith Valve Station would have on the surrounding neighborhood. The DRAFT Environmental Impact Report for the Worcester Commuter Rail Extension Project fails to address the effect increased traffic would have in a heavily populated area where two schools are located. We are very concerned for the safety of children and adults alike as they walk along these streets. 1

We are very much in favor of a Regional Station at Routes 495 and 9. Westborough would benefit from such a project without compromising the safety of its residents.

Very truly yours,

Alan P. Silvestry
Janice R Silvestry

Comment Letter No. 58

ROSEMARY JOHNSON
55 Mount Pleasant Street
Westborough MA 01581-2128

NB

March 6, 1995

RECEIVED
MAR 7 1995
MEPA

The Honorable Trudy Coxe, Secretary
Executive Office Of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Attention: MEPA Unit
Re: EOEA # 9154

Dear Ms. Coxe:

I am in favor of the commuter line stop here in Westborough, either at the Otis Street area, or downtown at the old railroad stop. There are complex issues involved which must be resolved. Some of these are town traffic patterns and financial assessment. (1)

However, public transportation will have a positive affect on all of our lives, those who use it as well as those who do not. I suggest the system of financial assessment be redesigned to reflect this benefit to all of us.

We must move now to begin this process. Each day we delay adds to the chaotic situation of traffic congestion, stress in peoples lives, and environmental pollution.

I attended a Citizen's Advisory Committee meeting a couple of weeks ago here in town, and although there were people attending who spoke out against a station at Otis because they believed it would have a negative affect on their neighborhoods, my sense was that the majority of people attending were in favor of it.

Yours truly,

Rosemary Johnson

Comment Letter No. 59

123 Milk Street
Westborough, Massachusetts 01581

59

The Honorable Trudy Coxe
The Secretary of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, Massachusetts 02202

RECEIVED
MAR 8 1995
MEPA

re: Environmental Report EOEA #9154

March 7, 1995

Dear Trudy Coxe:

I am writing in support of a local commuter rail station which will stop for passengers at the proposed Smith Valve site in Westborough. 1

I attended one of the open MBTA Advisory Committee meetings which allowed for public comment in regard to the DEIR. The majority of attendees were in support of a local station. The MBTA Advisory Committee seems to be in support of a regional station. Most of the townspeople thought a global 495 station was an unrealistic, short term solution and the idea would take years to study, develop and implement. It is time to move from the review stages to the implementation stages. We need a public transportation solution today!

One excellent proposal by Charlie Kelliher (Selectman) was to provide the town with a local station initially, with a limited number of parking and relocate the station if the global station was implemented at a later date. This idea not only addresses the immediate need of public transportation to Boston but plans realistically for the future needs of the town.

I have been a Westborough resident for thirty years and have been commuting to Boston for eleven of them. The traffic situation has increased considerably during this time, both locally and globally. In order for a Westborough resident to participate in public transportation today, one must drive to the Framingham station - arriving before 7:00 am to enure parking or continue onto to Riverside in Newton. This is not much of a public transportation option for the Westborough resident.

Westborough is a rapidly growing town, there has been much residential as well as commercial building during the past ten years. I have never heard of a traffic study done when all of the these strip malls, home centers and residential neighborhoods are built. I can't understand why people are opposed to something that will increase our property values, consolidate some of our traffic problems and make us a true satellite to a major city such as Boston.

I also understand there are individuals who are not in support of the commuter rail because they will not be utilizing the service to Boston. As a resident in any town, there are services many residents pay for but don't utilize - my husband and I pay and support the school systems through our taxes but we are without children. All of these combined services are in investment in the future of Westborough.

Comment Letter No. 59

We can also debate the mitigation issues forever. Frankly, most of the road and sidewalk updating needs to be completed, regardless of the commuter rail implementation. The town will never know all the issues, until the site has been developed. It is very difficult to obtain monies to support all of these speculative problems.

I also question the MBTA ridership projections. Early in my commuting years, I personally commuted with three other Westborough residents. If the projected ridership number is 22 I doubt I commuted with three out of the 22. I think you would arrive at a more accurate number if you took a poll on a Saturday at the Harvey Waste Site. Another idea to obtain accurate ridership numbers, would be to count the Westborough dump stickers on a trip to Boston on the Mass Pike.

I also feel that you may receive limited response to the DEIR. I felt that most people at the MBTA Advisory Committee meeting felt uninformed in regard to status of the commuter rail extension project. Most of the commuters read the Boston Globe and arrive home too late in the evening to watch the local cable station which provides limited updates on the project.

In closing, I am in support of the proposed local Smith Valve rail station. The implementation of the commuter rail project is necessary to support the transportation needs of current and future residents of Westborough.

Thank you for your consideration.

Sincerely,

Diane M. Power

Diane M. Power

gard to the DRAFT Environmental Impact Report (DEIR) for the Worcester Commuter Rail Extension Project. The DEIR fails to adequately address the basic issues of site contruction,noise and vibration abatement,safety,liability,and security for Smith Valve Station and the Town of Westborough.

Originally,the Westboro Station was proposed to be located on Fruit Street, Go To MBTA PROJECT,On P.14

Comment Letter No. 60

RECEIVED
MAR 8 1995
MEPA

MBTA PROJECT,From Page 11....

but due to local opposition, other sites were evaluated and the Smith Valve Site selected. Use of the downtown station was deemed unworkable due to site costs and increased traffic on East Main Street,even though this site would have the most favorable impact on revitalizing the Westboro downtown area.In the 18 years that we have lived in town,the traffic on East Main Street has always been horrible,but this has not stopped the construction of The Willows, the Fallon Clinic, Downtown Crossing, the new Post Office, etc.,and the development of the Rogers property and the Senior Citizen housing. In terms of traffic, a small station geared with an estimated 22 Westboro riders would have less impact than the Bodyshapers Gym, 50 East Main Street,where about 100 cars are often parked. Due to the train schedule, most of this traffic would occur prior to Westboro's "Rush Hour" in the morning and after it in the afternoon. Based on the schedules in the DEIR, oly two trains in each direction would be during peak traffic hours in Westboro.The cost of the site for the MBTA should not be a factor in Westboro recommending a station site. Westboro should choose a site based on what's best for the town and the town's residents. Selecting the Smith Valve station site with a projected ridership of 22 Westboro residents,the loss of taxable property,and no revitalization of the downtown area,does not seem to be in the town's best interest.

Recently,the Transportation Dept.has approved funding to do a feasibility study for a Regional Station at Route 495 and 9. The MBTA should be encouraged to do what is best for Westboro and the development of a Regic Station would provide strong ridership to Westb from Worcester and Boston area.This would b successful program for t area,businesses would loc and stay permanently. Too ten businesses start out this area and find we l resources that they co receive closer to Route and as they grow,they rel ate,our tax incentive has made a difference to th companies.

There is no mention in DEIR of the residents on south side of the station how they will be protec from noise,air pollution liability for transients accidents caused by elevation of theplatf which will abut th property.There are also po lines that run next to tracks: how will they aff the platform? This issue never addressed.What liab ity does the town face?

Westboro schools are pride of the entire comm ity.These schools will affected by the traf proposed for the Smith Va Station. The town buses pi up students at regular int vals on Fisher Street, M Road, Maynard Street and A Street.These streets are ready known as cut-throu to reach BJ's,Sam's,Stop Shop,as well as daily traf to Shrewsbury and Worcest The MBTA provides no fund for widening of streets providing sidewalks.There a safety factor involved these streets are narrow have no sidewalks. One ad lost their life on Fis Street in 1994. If doll are to be spent for safety will come from Westboro. will be responsible for safety of our community be allowed to pay the asse ment the MBTA will establi all for 22 Westb residents.

Please, if the MBTA is direct a station to this a and money is to be spe

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Originally,the Westboro Station was proposed to be located on Fruit Street, Go To MBTA PROJECT,On P.14

Comment Letter No. 61

RECEIVED
MAR 8 1995
MEPA

Thank you
Jacqueline McCoy
Lloyd McCoy
11 Fisher St
Westborough
Ma

MBTA PROJECT,From Page 11....

but due to local opposition, other sites were evaluated and the Smith Valve Site selected. Use of the downtown station was deemed unworkable due to site costs and increased traffic on East Main Street,even though this site would have the most favorable impact on revitalizing the Westboro downtown area.In the 18 years that we have lived in town,the traffic on East Main Street has always been horrible,but this has not stopped the construction of The Willows, the Fallon Clinic, Downtown Crossing, the new Post Office, etc.,and the development of the Rogers property and the Senior Citizen housing. In terms of traffic, a small station geared with an estimated 22 Westboro riders would have less impact than the Bodyshapers Gym, 50 East Main Street,where about 100 cars are often parked. Due to the train schedule, most of this traffic would occur prior to Westboro's "Rush Hour" in the morning and after it in the afternoon. Based on the schedules in the DEIR, oly two trains in each direction would be during peak traffic hours in Westboro.The cost of the site for the MBTA should not be a factor in Westboro recommending a station site. Westboro should choose a site based on what's best for the town and the town's residents. Selecting the Smith Valve station site with a projected ridership of 22 Westboro residents,the loss of taxable property,and no revitalization of the downtown area,does not seem to be in the town's best interest.

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Please, if the MBTA is direct a station to this a

and money is to be spe

Comment Letter No. 62

21 OLD COLONY DRIVE
WESTBOROUGH, MASSACHUSETTS 01581

March 5, 1995

RECEIVED
MAR 8 1995
MEPA

The Honorable Trudy Coxe
Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Ms. Coxe:

Subject: Environmental Report EOEA #9154

We would like to register our opposition to the Smith Valve site for a Westborough train station. (1)

It is our considered opinion that several of the access roads to that site cannot carry the traffic that would be generated by a facility of the size intended. Several of the streets are narrow and have no sidewalks, and we feel that public safety would be endangered. As well, residential properties on the south side of the site will be adversely impacted. (2)

While we feel that train service would be an advantage to the citizens and businesses of Westborough, it would be best to construct a Regional Station at Routes 495 and 9. We would urge that a feasibility study be done of the Route 495 location be done, as that location would confer the benefits of train service without the problems inherent in the Smith Valve siting. (3)

Very truly yours,

Robert L. Brais

Barbara R. M. Brais

Copy: Westborough Selectmen

Comment Letter No. 63

March 6, 1995 [illegible]

To the Secretary of Environmental Affairs:

If we must have an MBTA station in town, please put it on 495. The traffic through town now is awful and a station at [illegible] would certainly impact the neighborhood negatively - short cuts will be taken to avoid the already heavy traffic, morning and evening. (1)

I feel a great many people are being pressured to accommodate the few who will be using this transportation.

Sincerely,

[illegible]
Box 31
Westboro, Mass

RECEIVED
MAR 8 1995
MEPA

Comment Letter No. 64

N3

RECEIVED
MAR 8 1995
MEPA

3 Benjamin Drive
Westborough, MA 01581

March 7, 1995

Secretary of Environmental Affairs
Executive Office
100 Cambridge Street, 20th Floor
Boston, MA 02202
Attn: MEPA Unit, Project No. EOEA-9154

Gentlemen:

I am writing to express my opinion regarding the possibility of the MBTA locating one or more local stations in or about the Town of Westborough. I am decidedly against this proposal.

The principal basis for my objection is as follows:

1. The MBTA has been unable to guaranty to the Town of Westborough that it will not be the subject of financial assessments in the future. In a time when local aid has been flat or reduced, towns simply cannot afford to pay for additional mandates presented to them by state government agencies. The benefit of a local train station to the Town of Westborough and its residents, is relatively negligible and would be greatly outweighed by the detriment of assessments that might be made in the future. (1)

2. While the location of a station in Westborough might be beneficial to the MBTA, it would present significant problems for the Town of Westborough. Motorists travelling from Northboro and Shrewsbury would clog Westborough roads as they attempt to reach the station. Increased traffic would obviously present added danger, especially to children who must walk to either the Middle School on Fisher Street or the Armstrong School on West Street. Many neighborhoods in Westborough lack sidewalks and traffic increases would likely pose significant dangers to the walking public. (2)

(3) I would urge the MBTA to further study the situation and present a plan for one regional station (perhaps closer to Route 495) which would draw more riders to one location which could accommodate it, and keep traffic off local roads.

Very truly yours,

Marvin S. Silver

MSS/lms

cc: Board of Selectmen, Town of Westborough

Comment Letter No. 65

3/5/95

7 Hyder Street
Westborough, MA 01581

March 7, 1995

RECEIVED
MAR 8 1995
MEPA

Office of Environmental Affairs
100 Cambridge Street
20th floor
Boston MA 02202
Re: Environmental Report EOEA #9154

Dear Honorable Trudy Coxe,

I am writing about the proposed MBTA train station in Westborough. I strongly support the decision to build a commuter rail station in Westborough as well as in other neighboring communities. (1)

Speaking as a Boston-bound commuter, I would welcome the opportunity to take the train every day to work. Access to a commuter rail in this area would diminish the traffic on the Massachusetts Turnpike and decrease air pollution from vehicle exhaust.

In addition, an MBTA station would raise the property values of Westborough and attract businesses. Ultimately the "boroughs" would become a desirable place for the Boston-bound workforce to buy property and build houses.

The article in the Saturday March 4th issue of The Community Advocate (p. 8) suggested a regional station, located at Route 495 and Route 9. I feel the Office of Environmental Affairs, town selectmen and MBTA are well qualified to select the best location (Smith Valve Station and the town center are the other two sites).

Please let me know if my support should be directed to a particular MBTA committee member or State Representative or Senator. I sent a similar letter to Westborough Selectman John Cahill, in January.

Once again, I encourage the town of Westborough to connect itself with its neighboring towns and with Boston.

Sincerely,

Barbara Reismann

Barbara Reismann

Comment Letter No. 66

3/8/95 NB

William & Mary Anne Coveney
One Kimball Road
Westborough, MA 01581

March 6, 1995

RECEIVED
MAR 8 1995
MEPA

The Honorable Trudy Coxe
Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Re: Environmental Impact Report EOEA # 9154

Dear Ms. Coxe:

We are writing in regard to the Draft Environmental Impact Report EOEA #9154 (DEIR) for the Worcester Commuter Rail Extension Project. We insist that you reconsider the proposed site at the Smith Valve Parkway. (1)

We would obviously prefer that the MBTA locate a station in another community, but being that Westborough is a prime location it is a wonder why a spot so close to a residential neighborhood is being proposed. It is our understanding that safety and security issues regarding residents bordering the train tracks have not been addressed. One must consider the potential tragedies that could occur; not to mention the noisy nuisance that would impact all of us living within such close proximity to this station.

First and foremost let us address the safety issues to the greater neighborhood as a whole. This station will bring increased traffic to Fisher Street. This already populated area is host to another development of new homes (the Assabet Estates). Fisher Street is host to numerous bus stops as well as children walking to the Armstrong School as well as the Sarah Gibbons Middle School. The sidewalks as they exist are dangerous and poorly maintained. An appropriation for $30,000 worth of improvements to the sidewalks on Fisher Street is amomg the articles coming up at the next town meeting, as of this writing the town's Finance Committee has still made no reccomendation on this appropriation. If these sidewalks, that are already hazardous for our children are not improved, and traffic flow increased, the next fatality on Fisher Street, could be one of our children(an adult was killed on Fisher Street in 1994). In addition to the poor construction of the existing sidewalks on Fisher Street, there is a large portion of (2)

Fisher Street that is curvy, narrow and without any sidewalks for pedestrians. Again with increased traffic this poses a serious danger to all pedestrians in our area, most importantly our children. A further financial burden would be placed on the Town of Westborough to construct new sidewalks from the corner of Fisher Street and Kimball to at least the corner of Fisher Street and Otis Street.
It is our understanding that two other sites were also proposed for this MBTA station, both seem worthy of more extensive consideration. We respectfully request that the downtown site at Fruit Street be re-evaluated. With an existing train station already present, it would seem an ideal location. This station would not have as great an impact on residences. Another site we respectfully ask you to consider would be the proposed site at the junction of Routes 495 & 9. Already an industrial area, it seemingly possesses alot of open space for parking and is an ideal spot for a greater use of a commuter rail. This spot seemingly could benefit not only residents of Westborough, but also residents of surrounding communities, namely Southborough, Marlborough, Northborough and Upton.

(3)

In the best interest of the Town of Westborough and greater ridership for the MBTA, please reconsider this most hazardous situation. With prudence and careful consideration we can satisfy both the Town's best interest and the MBTA commuter's interest. Please reconsider the selection of the Smith Valve Station for the safety of the residents of this community. In the best interests of the community and this neighborhood we ask you to select a more industrialized site.

Respectfully,

William F. Coveney

Mary Anne Coveney

Bill and Mary Anne Coveney

cc: Selectman's Office, Town of Westborough

Comment Letter No. 67

JANE DUNPHY

MEPA
318

March 4, 199:

Dear Mr Coxe,

Just a quick note to let you know that we would very much like to see a train stop on Smith Valve Rd. in Westboro

We live on Maynard which is near Fisher & Otis Rts.

We believe it is the very vocal minority that is making all the noise. Most Westboro residents want a stop but they are

1

to busy to work for it.

It's about time for this country to get back to railroading. As the population grows it will become a necessity.

Sincerely,
Jane C. Dunphy
Richard J. Dunphy

RECEIVED
MAR 8 1995
MEPA

Comment Letter No. 68

13

Joseph P. Orlando
5 Meadow Road
Westboro, Massachusetts 01581
Feb. 20, 1995

Regarding Eviromental Report
EOEA #9154

Dear sir:

I think that siting the train station on Smith Valve Parkway is a very poor choice for the town of Westboro. I believe that a feasiablity report should be for a regional site near "495", this would be more advantages to all the towns. I believe that there is money for this study, and it should be done. I believe that if it is put at Smith Valve that this will put a big burden on the town, and the neighborhood, and no question about it 495 is the best place. 1 2

Thank you

Joseph Orlando

Joseph P. Orlando

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MEPA

Comment Letter No. 69

ND

RECEIVED
FEB 2 4 1995
MEPA

14 Maynard Street
Westboro, MA 01581
February 22, 1995

To The Secretary of Environmental Affairs,

I am very disappointed with the Draft EIR for the Worcester Commuter Rail Extension Project (EOEA 9154). I believe it does not accurately reflect the impacts it will have on my town of Westboro.

The following are my comments:

I. Need
A) Page 2 of the ENF asks what conditions have changed that would make re-establishment of the service successful and viable? I don't see where this is answered.

B) What is the benefit to Westboro, since it's projected only 22 residents will use the train? (1)

II. Air Quality
A) The air quality benefits don't seem to be very great given the number of commuters likely to use the new line, and the number who will be diverted from the bus service.
B) What about the decrease in air quality for abutters to the tracks with the increase in the number of trains running, and increase car traffic through our streets? (2)

III. Noise
A) Where are the 32 homes in Westboro that will be affected by noise according to table 7.3-3? (3)
B) Where would the 5650 feet of potential noise barriers be per table 7.3-3? (4)
C) There will be 31 additional trains (p.3-45) running as late as 1:20 AM. Even if the commuter trains are significantly quieter than the freight trains that are currently using the track, 31 additional trains will be a nuisance!!! Also, these trains will be stopping near our homes, and not at full throttle creating more noise!
D) "Sealing any holes in exterior surfaces... and by providing forced ventilation and air conditioning so that windows do not need to be opened" (p.7-20) to avoid disturbance from the noise IS NOT ACCEPTABLE!!!!! As an abutter to the tracks, I will not close my house up like a cage! (5)
E) There is not enough explanation in the draft to make noise impacts understandable to the average reader, The MBTA should clearly explain & elaborate these noise impacts. (6)
F) I request the MBTA be required to place noise barriers along the tracks in Westboro, regardless of the siting of a station here. (7)

IV. Traffic
A) There will be 90 riders from Northboro, 42% of riders at the Westboro station, per table 14.1-4. Northboro riders will travel Rte. 135 East, to Maynard St., to Fisher St., to Otis St. to the site, in order to avoid Rte. 9 traffic and lights (especially since they will need to make a left turn at the lights on Rte.9 to Otis St. and incur a long wait). Page 14-10 states those who would drive to the

Comment Letter No. 69

(8) station are "already on the road", however those going to Boston would have no reason to travel to Maynard St., they would get directly onto Rte. 9 East.

Property Values

A) Per p.6-3 "The project's line impacts on propery vaules are likely to be negligible." (9) I feel my neighborhood will be adversely affected by a decrease in air quality, increase in noise from the 31 additional commuter trains, and an increase in car traffic. I had my home on the market Oct. '93 - Jan. '94. I did not receive any offers, and was told the only reason was the possiblity of the Smith Valve train site.

(10) In conclusion, I would like further explanation for the cost and benefit of this project; further studies on air quality for abutters, especially the affect of diesel fumes on small children (Westboro's Middle School is on Fisher St. which abuts the tracks); noise barriers for Maynard, Arch, Fisher, and Water Streets; sidewalks and restrictive signage (11) for these same roads plus Mill Rd.; finally more details on the possible assessment to our town. I would like these concerns addressed (exclusive of sidewalks and signage) even if Westboro does not have a station.

If Westboro must have a station please site it off of Rte. 495 & out of our neighborhoods!

Sincerely,

Elizabeth M. Colbert

Elizabeth M. Colbert

Comment Letter No. 70

NB

Joseph Harrington
4 Jefferson Road
Westborough, Mass. 01581

February 14, 1995

The Hon. Trudy Coxe, Secretary
Executive Office of Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street, 20th Floor
Boston, Mass. 02202

Re: EOEA #9154

Dear Ms. Coxe:

I have reviewed the Draft Environmental Impact Report on the Worcester Commuter Rail Extension Project (EOEA Project #9154) which was submitted to the EOEA MEPA Unit by the Massachusetts Bay Transport Authority in November 1994.

I commute daily to Boston from Westborough, occasionally making use of the MBTA. My usage increased significantly when the Worcester-Framingham-Boston express service was initiated. It would increase substantially again if service were brought to our local region.

However, I do not favor the proposed Westborough station. I believe that a regional station at I-495 would have reduced local impacts, and eliminate the need for the currently-proposed Southborough and Westborough Stations. (1)

This option should be pursued as aggressively as possible. A comparison should be made of the relative impact of this proposal to the proposed action. In Section 17 of the DEIR, I found comparisons of various locations for a regional station but no clear comparison of the regional station as a substitute for the Southborough and Westborough stations. This is a weakness in the report. (2)

In closing, I wish to applaud the attempt to expand commuter rail service, in the interest of reducing overall traffic congestion and the resulting environmental impacts. I hope that it is successful. A regional station at I-495 and I-90 makes a lot of sense, and only if it is impossible should the proposed Southborough and Westborough Stations be considered.

Very truly yours,

Joseph Harrington

cc John F. Cahill, Member,
Westborough Board of Selectmen
Joyce T. Coll, Chairperson,
Westborough MBTA Advisory Committee

Comment Letter No. 71

February 21, 1995

B

Re: EOEA # 9154

Honorable Trudy Coxe:

I am a resident at 89 Fiske St., Littleton, MA. I have owned my home and raised my family here since 1954.

My backyard gave access to the railroad track and I am greatly against the pollution and noise of trains stopping and starting in the back of my property.

I can remember when the trains nearly destroyed the quiet of our neighborhood.

Respectfully,

Mrs. Paul A. Smith
89 Fiske St.
Littleton, MA
01460

1

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FEB 23 1995
MEPA

Comment Letter No. 72

Westborough, MA. 01581
February 17, 1995

NG

Secretary of Environmental Affairs
Executive Office of Environmental Affairs
100 Cambridge St.
20th Floor
Boston, MA. 02202
Attn: MEPA Unit - Project 9154

RECEIVED
FEB 21 1995
MEPA

Dear Secretary:

Thank you for sending us a copy of the MBTA's draft Environmental Impact Report EOEA #9154. We have commented to you on the MBTA's previous draft, issued in 1992, and unfortunately, we find it necessary once more to call your attention to some issues that bother us very much and still remain unsatisfactorily resolved.

We are residents of Maynard St. which is located near the proposed Smith Valve station site in Westborough. Let us say first that we are not opposed to the idea of MBTA service from Westborough to Boston. Our main concern is with the Smith Valve site and is focused on the safety of our children and the children of other families in this neighborhood as they walk to schools on Fisher St. at the very time that commuters are rushing for their trains. We do support the idea of a regional station accessible through major thoroughfares in the Route 495/90 area. We would like to bring to your attention the following: (1)

- The MBTA's estimate of the number of cars using Maynard is unrealistically low. They choose to downplay the importance of this street in providing a back access to Smith Valve for traffic coming from Northboro. Instead they feel that the State's proposed improvements to the Otis Street/ Route 9 intersection will make that an attractive route to the station. (2)

  The proposed improvements in the Otis St./ Route 9 intersection, scheduled for 1996, will only add more length to the turning storage lane allowing MBTA bound traffic to stack up safely out of the way of Route 9 through traffic. These improvements will do little to make the turn easier.

  The MBTA is not giving local drivers credit for knowing enough to avoid the Otis Street intersection. Traffic coming from Northboro will choose to stay on Milk St. and use Maynard St. to come in the back way. Thus we can expect the roughly 40% Northboro ridership, or 80 cars, to come whizzing down our street every morning.

- The MBTA's estimate of the number of cars using Fisher St. is unrealistically low. Anyone who knows the area would prefer to take Milk St. and Fisher St. from the rotary to Smith Valve rather than Mill Rd. It makes more sense on the map (see map attached) and it makes more sense driving. Obviously, the MBTA would like to downplay traffic increases on Fisher Street because of the schools. This could mean the 20% (40 cars) from the Upton area will use Fisher St. (3)

- When you look at it this way that's 120 cars converging on the Maynard/Fisher/Mill Rd. intersection. At the same time there are school children walking from residences on these streets and from a new development of houses right on the corner of Fisher and Mill St.

Comment Letter No. 72

You asked that several intersections, among them the Maynard/Fisher/Mill intersection, be studied for "safety and operational limitations" (ENF Certificate pg. 11 first paragraph). The MBTA's "exhaustive" study has come to the conclusion that anticipated traffic levels will not degrade the "Level of Service" of the intersections in our neighborhood and "will not have an adverse impact on traffic operations within the Westborough study area ((pg. 14-26 first paragraph). Once again the MBTA has missed the safety issue. Maynard St. and Mill Rd. are narrow winding roads and have no sidewalks, Fisher St. has poor and spotty sidewalks. Our children and the other neighborhood children use these streets to walk to and from school. Our "Level of Service" may be excellent but our children are at an increased risk from the new traffic generated by the MBTA station. (4)

Furthermore, Fisher St. is oriented roughly east-west and the rising or setting sun can sometimes be directly in the eyes of drivers. This past Fall a woman was struck by a car and killed while walking along Fisher St. (no good sidewalks) when the driver's vision was impaired by the setting sun. This was only at 4:55pm, a time when school children can also be walking home from after school activities.

- The MBTA, in what only can be considered an attempt at injecting some humor into an otherwise very dry document, offers to put signs on Fisher St. "to discourage station bound traffic from using the section of Fisher St. adjacent to the school" (pg. 14-41). Do they seriously think that signs would keep the daily drivers from finding the most expeditious route to the station? Is this what you would consider safety mitigation? (5)

- Almost as an afterthought the MBTA addresses pedestrian safety on pg. 14-39 and then only for their ridership who walk to the station (which their projections forecast to be none), by offering to work with the town to provide sidewalks "on Otis St. and possibly other sidewalks on nearby streets which would carry station oriented traffic." This again misses the point about safety of the non-station oriented school children who must cross the streets and walk along the shoulders. (6)

We do not think the MBTA has adequately addressed your instructions in the ENF Certificate of October 22, 1992 for the Environmental Impact Report to "consider modifications to the key traffic routes to discourage the use of rural and residential streets" (Pg. 11). We request that you insist that the MBTA consider a more realistic impact of ridership traffic on the Fisher St./Maynard St./Mill Rd. neighborhood and follow your instructions to discourage the use of these streets by providing some meaningful solutions to the safety problems they will be causing. (7)

We also request that serious consideration be given to a regional station in the Route 495 area to alleviate the impact of the Smith Valve and other local sites. (8)

Sincerely,

Helen Panas Bill Panas

William and Helen Panas

cc: Westborough Board of Selectmen
Westborough MBTA Advisory Committee
MBTA Citizen Advisory Committee
Representative Ron Gauch
Senator Bob Durand

Comment Letter No. 73

135 E. Main St. #E5
Westboro, Ma. 01851
Feb. 8, 1995

RECEIVED
FEB 1 6 1995
MEPA

Ms. Trudy Coxe, Environmental Secretary
Attention MEPA Unit
20 th. Floor
100 Cambridge St.
Boston, Ma. 02202

re: EOEA 9154 Comuter Rail (Westboro)

Dear Ms. Coxe:

First I must say how pleasant and helpful the woman answering the impact study line was when I called.

My comment on the proposed railroad station in Westboro is that sufficient study time and money has been spent and it is time to implement the MBTA proposal. The "T" has chosen a site remote from homes and adjacent to a major highway. The concept of a regional station proposed by some will not be useful to the residents of Ashland or Grafton and another study will only cost money but time. During that time more cars will be using the highway instead of rail and truly having an environmental impact. (1)

Some people question the studies expected rider counts, particularly when broken down by town. This discussion could go on forever and the

Comment Letter No. 73

answer will come when the station is built and not before. The parking lot size will limit the rider ship as it does at existing stations.

Commuter rail is a proven system and every town that has a station considers it an asset.

Please consider the study complete and recommend it's implementation.

Sincerely,

William M. Murphy

Comment Letter No. 74

NS

4 Juniper Circle
Westborough, MA 01581-1811

March 7, 1995

RECEIVED
MAR 9 1995
MEPA

The Secretary of Environmental Affairs
Attn: MEPA Unit, Project #9154
Executive Office
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Ms. Coxe:

I am writing in regard to the potential placement of an MBTA commuter rail station in Westborough.

In the nearly nine years my husband and I have lived in Westborough, there have been many times we have wished for train service into Boston. I support public transportation and think it would benefit our community. However, I strongly object to the proposed siting of the station.

I do not believe the study which says that traffic will not be greatly impacted in the area of Fisher, Mill and Maynard Streets. These are residential streets with two elementary schools in the area. Any traffic increase will have a negative impact in such a neighborhood. (1)

The potential for a regional station at the intersection of Routes 9 and 495 has been too quickly dismissed. With Route 30, the Massachusetts Turnpike, and several industrial parks nearby, a station in this location could be a valuable transportation hub. The additional noise and traffic would have much less negative impact in this industrial area. (2)

Lastly, it is not fair to expect residents to welcome the station anywhere in town until we know the assessment formula to be used. We cannot commit to further drains on our town budgets without knowing to what we are committing. (3)

Thank you for your attention and diligence in pursuing an equitable solution to this problem.

Yours truly,

Jennifer M. Speed

Jennifer M. Speed

CC: Westborough Board of Selectman

Comment Letter No. 75

15

16 Phylmor Dr.
Westboro, MA 01581
March 6, 1995

Secretary Trudy Coxe
Environmentail Affairs Office
100 Cambridge St, 20th Floor
Boston, MA 02202

Reference: Project #EOEA 9154

Dear Ms. Coxe,

I have reviewed the above referenced Draft Environmental Impact Report and would like to express my support for the planned expansion of the Worcester Commuter Rail. In particular, I support the inclusion of a station on Smith Valve Parkway in Westboro. (1)

I believe that the traffic impact to Westboro will be manageable and that the project should proceed. I also believe that while the cost to Westboro cannot be guaranteed, the state legislature can be called upon to exercise prudence and allocate charges as equitably as possible.

It is time to move forward with this plan.

Sincerely,

Bruce R. Johnson

RECEIVED
MAR 1 [illegible] 1995
MEPA

Comment Letter No. 76

February 28, 1995

The Honorable Trudy Coxe
Office of Environmental Affairs
20th Floor
100 Cambridge Street
Boston MA 02202

RECEIVED
MAR 7 1995
MEPA

Re: **Environmental Impact Report EOEA #9154**

Dear Ms. Coxe;

We are once again writing to the Office of Environmental Affairs regarding the proposed MBTA station on Smith Valve Parkway, Westborough as part of the Worcester Commuter Rail Extension Project.

We have been residents of Westborough for over 10 years. We and our young children have been experiencing the negative impact of commercial and retail development on Fisher and Otis Streets, Route 9 and Smith Valve Parkway. In addition to increased traffic on small country roads not designed to handle the amount of daily activity, there has been an increased level of noise pollution. The proposed station will only add to the burdens placed on this once-quiet neighborhood.

In addition, we are concerned about other aspects of this station:

- increased noise pollution
- increase in air pollution from idling trains
- vagrancy of train passengers
- close proximity of the station to the environmentally sensitive Hoccomocco Pond areas
- the area is NOT convenient to commuters in comparison to placing a regional station near Route 495.
- the proposed station is in very close proximity to the proposed Grafton station and we question the viability of 2 stations within 2 miles of each other

This is not a case of "not in my back yard". This is about placing an MBTA station in an area which makes the most sense for the commuting public and the citizens of Westborough.
It is our sincere hope that the Westborough station is NOT placed on Smith Valve Parkway. If a station is necessary in Westborough, we feel that the Route 9/90/495 corridor makes more sense with regard to commuter convenience and potential impact on surrounding areas. (1)

Thank you for your consideration in this matter.

Sincerely,

Cheryl and Paul Crivello

Cheryl and Paul Crivello
79 Fisher Street
Westborough MA 01581

cc: William F. Weld
James J. Kerasiotes
Westborough Board of Selectmen

Comment Letter No. 77

NS

Susan B. Stager
27 Arch Street
Westborough, Massachusetts 01581

February 26, 1995

The Honorable Trudy Coxe
Secretary, EOEA
MEPA Unit
100 Cambridge Street
20th Floor
Boston, MA 02202

RECEIVED
MAR 1 1995
MEPA

Re: DEIR Worcester Commuter Rail Extension
EOEA #9154

Dear Ms. Coxe:

I am writing to express my support of the amendment included in the transportation bill which states that the MBTA will do a feasibility study of a regional rail station on #495, in preference to the establishment of a rail station on Smith Parkway in Westborough. (1)

I live on Arch Street, which connects one end of Fisher Street with Glen Street, which intersects Route 30. Therefore we see lots of traffic moving from Route 30 through our neighborhood to Route 9 via Smith Parkway and Otis Street. Traffic has increased steadily over the years, as commercial development at and near the junction of Otis Street and Route 9 has grown: Bose Corporation, Astra Pharmaceutical, BJ's and Stop and Shop, Sam's Club, and now Wal-Mart coming soon.

Don't mention the word "mitigation" to me. There has never been any mitigation on our street in response to all the commercial development I have mentioned. Arch Street remains a narrow, winding, hilly country road which at one point passes through an even narrower underpass beneath a railroad bridge. The latest reminder of the hazardous character of the street occurred last winter during a blizzard. A neighbor had a near fatal accident when her car skidded out of control and went into the swamp water upside down right next to the underpass. Thank God another neighbor saw it happen, and the driver's life was saved. Afterwards a guardrail was erected on the side of the road at that spot. I guess that's mitigation, but by the Town of Westborough and not in response to commercial development.

I oppose the establishment of a local rail station on Smith Parkway. The simple fact that there is sufficient land there that can be acquired fairly easily and fairly economically does not make that an appropriate site for a station. That fact is outweighed by the profound negative effects a station would have on our street and other streets radiating in all directions from that location through neighborhoods similar to ours in Westborough and Shrewsbury. (2)

You undoubtedly know that our street does not have sidewalks. All of our school age children are bussed to school, but they WALK to the bus stops! Others use the street constantly: people walking dogs, children playing and riding bikes, people of all ages walking or jogging for exercise. Every increase in traffic makes the street less safe for all of us. In my opinion the safety, the sanctity of local neighborhoods should be the foremost consideration. (3)

Comment Letter No. 77

Re: EOEA #9154 February 26, 1995

(4) A regional station on Route 495 will accomplish the legitimate purposes of increasing public transportation. The car traffic generated by that station will be dispersed over many more major routes and will not adversely impact neighborhoods. I ask that you support that better alternative for the commuter rail extension.

Thank you for your attention to my concerns.

Sincerely,

Susan B. Stager

cc: Board of Selectmen, Westborough
MBTA Advisory Committee

Comment Letter No. 78

RECEIVED

JAN 23 1995

TOWN OF WESTBOROUGH
SELECTMEN'S OFFICE

January 19, 1995
84 Fisher Street
Westboro, MA 01581
508-366-5884

Dear Town Select Committee,

Given the current controversy over a commuter rail stop in our town, I wish to write in strong favor of the proposal. I support the Fisher St/Arch St. stop. Most notably, I also write as a neighbor of the stop (84 Fisher). Actually, I don't care where the stop is, just as long as Westboro gets one. I also support the Route 495 regional stop, if this is the compromise it takes to make the trains stop in Westboro. (1)

As a person who cares deeply about our environment and the impact that gasoline-powered automobiles has on the quality of life of our area and on the planet, a commuter rail station in Westboro is a most intelligent transportation policy. It's real hard for me to take seriously those who argue that we need fewer transportation alternatives (i.e., "we don't want it here").

As someone who commutes twice a week into Boston, I am also concerned about the impact on me (it's a waste of my time to be driving a car as opposed to doing work on a train) and my car (more miles) of driving into the city. The quality of my life would definitely increase if I were able to drive a very short distance to a Westboro stop (or even walk, if it's at Fisher/Arch), and then ride the train into the city.

Please do not let the knee-jerk "NIMBYs" influence this crucial decision. These Luddites do not have the right to deny us the critical alternatives we need to driving up and down heavily clogged highways.

Sincerely,
Ellen Gugel

Ellen Gugel

Comment Letter No. 79

To Selectman Allen

January 29, 1995

Dear Kris,

I spoke to you briefly as I exited the MBTA Advisory Committee meeting on Wednesday, January 25th. I said I knew no one who could use a commuter rail to Boston.

I would like to go on record as preferring a regional station to a local station on Smith Valve Parkway.

I could tolerate the increased traffic near my neighborhood if I thought it would benefit Westborough residents. I do not want to pay for nor be inconvenienced by a station used by other towns.

A regional station could meet increasing demands on it. Hopefully it would eventually provide weekend service for those of us who would enjoy going to a play or a museum but do not commute to Boston or downtown Worcester for work.

Sincerely,
Barbara Sullivan
6 Linda Street

[illegible]
3 [illegible]

1

Comment Letter No. 80

NB

To: Massachusetts Office of Environmental Affairs

March 5, 1995

Re: EOEA Worcester Commuter Rail Extension

RECEIVED
MAR 8 1995
MEPA

I am a resident of Southborough and commute daily into Boston. I often take the Commuter Rail from Framingham and I am strongly in favor of a commuter rail station in Southborough. (1)

I would hope the station could be used for reverse commuting and week-end service as well as daily commuting. (2) Additionally, I would hope the MBTA will do everything possible to mitigate the impact of the station on the surrounding area ie limiting number of parking spaces, making road improvements, etc (3)

Thank you.

Richard E. Fournier

Richard E. Fournier, Jr.
33 Darlene Drive
Southborough, MA 01772

Comment Letter No. 81

NC

February 23, 1995

Secretary Trudy Coxe
Attn: MEPA Unit
Massachusetts Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, Massachusetts 02202

RECEIVED
FEB 2 6 1995
MEPA

Re: EOEA 9154 Worcester Commuter Rail Extension

Dear Ms. Coxe:

I am writing this letter in support of the proposed commuter rail station to be located near the intersection of route 85 and Coardaville road on the Southborough - Hopkinton line.

I am a resident of Southborough and live within 1/2 mile of the proposed station. I cannot conceive of any adverse affects of locating this station along what is already a busy state highway in an underutilized commercial district. I see great benefits to the area as a whole due to the reduced traffic of commuters either driving to Boston or to Framingham to meet the train. Other considerations which make this location ideal include the fact that the tracks are already in use, there are no street level train crossings in Southborough along this line.

(1)

I look forward to the opening of the new station.

Sincerely,

James P. Knowles

James P. Knowles
39 Darlene Drive
Southborough Ma 01772

Comment Letter No. 82

NB

February 23, 1995

RECEIVED
FEB 2 4 1995
MEPA

Secretary Trudy Coxe
Attn: MEPA Unit
Massachusetts Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, Massachusetts 02202

Re: EOEA 9154 Worcester Commuter Rail Extension

Dear Ms. Coxe:

I am writing this letter in support of the proposed commuter rail station to be located near the intersection of route 85 and Coardaville road on the Southborough - Hopkinton line. (1)

I am a resident of Southborough and live within 1/2 mile of the proposed station. I cannot conceive of any adverse affects of locating this station along what is already a busy state highway in an underutilized commercial district. I see great benefits to the area as a whole due to the reduced traffic of commuters either driving to Boston or to Framingham to meet the train. Other considerations which make this location ideal include the fact that the tracks are already in use, there are no street level train crossings in Southborough along this line.

I look forward to the opening of the new station.

Sincerely,

Peter Venuto
16 Darlene Drive
Southborough Ma 01772

Comment Letter No. 83

NB

RECEIVED
FEB 2 1 1995
MEPA

February 14, 1995

Secretary Trudy Coxe
Attn: MEPA Unit
Massachusetts Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Ms. Coxe:

I am a resident of Southborough and live near the proposed EOEA 9154 Worcester Commuter Rail Extension. I am writing to let you know that I strongly support building the proposed railroad station at this site and think it will have many positive effects on the community. (1)

Sincerely,

Patricia C. Pirozzi

Patricia C. Pirozzi
21 Darlene Drive
Southborough, MA 01772

Comment Letter No. 84

RECEIVED
FEB 21 1995
MEPA

February 14, 1995

Secretary Trudy Coxe
Attn: MEPA Unit
Massachusetts Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Ms. Coxe:

I am a resident of Southborough and live near the proposed EOEA 9154 Worcester Commuter Rail Extension. I am writing to let you know that I strongly support building the proposed railroad station at this site and think it will have many positive effects on the community. (1)

Sincerely,

James M. Waddell
21 Darlene Drive
Southborough, MA 01772

Comment Letter No. 85

NF

October 4, 1994

RECEIVED
OCT 6 1994
MEPA

To: The Board of Selectmen
Town of Southborough
Town House
Southborough, MA 01772
From: Russell A. Fustino
Subject: Woodland Road / Route 9 crossover median should be closed --
MBTA Impact Analysis provides even more proof (EOA NO. 9154)

Dear Board of Selectmen:

I would like to commend the Selectmen who publicly stated their safety concerns and the benefits regarding potential closure of the Route 9 / Woodland Road crossover at the 9/27/94 Selectmen meeting. I am disappointed however, at yet another delay in the decision making process for the closing of that intersection; this time for MBTA impact analysis. Road safety minded residents have had to endure 6 delays over the past 2 1/2 years. The evidence continues to mount, as time passes by, to justify closing the median.

1

In 1992 the Southborough DPW traffic study confirmed impact to side roads was not significant. Support was given by the police, fire and DPW departments as well as the Town planner. In the spring of 1994, Peter Donahue of the State Highway department along with Representative Barbara Gardner and Senator Robert Durand met with the Southborough Roads Safety Committee. He stated that 40% of the accidents at the Woodland Road / Route 9 intersection were caused by crossover traffic. All are in favor of a safer Route 9. In the Summer of 1994, Police Chief Colleary provided accident statistics to the Southborough Roads Safety committee for all roads in the town. This intersection has seen 27 accidents in the last 5 years. It saw one more just a few days after the 9/27 meeting that involved my neighbor, raising the total to 28. The Route 85 / Route 9 intersection, where the traffic would go, is the safest intersection on Route 9 in Southborough. Since bridge construction completed, it has seen only 16 accidents over the last 4 years. The Route 9 State Highway Improvement Plan will extend the on and off ramps, making this an even safer intersection.

I have talked to over 80 Woodland Road residents during the past 6 months and only 5 wish for this median to remain open. The overwhelming majority would like to see the Route 9 median closed. I have also talked to several other safety minded non-Woodland Road residents who would also like to see this median closed. For people who want to keep the median open, the strongest argument they have to offer is one of convenience. Keeping the median open would get them home a minute or two sooner. The road would not be closed, just the median. Woodland Road is still assessable for anyone who wishes to use it.

I have analyzed closing the median at Route 9 and Woodland Road with respect to the Environmental Impact Report (EOA NO. 9154) for the proposed MBTA station. As vice-chairmen of Southborough Roads Safety Committee, I will be presenting this analysis at the next Roads Safety meeting on October 11 at 7 p.m. at the firehouse. This document provides a wealth of statistical information that further supports the median should be closed.

Comment Letter No. 85

1) In the report, it states: turning "from Woodland Road to Cordville Road operates *unacceptably* at certain peak periods" . The report indicates a current (1992) Level Of Service (LOS) rating of F, at this intersection during the peak PM Hour. 'F' is the worst rating in an A through F scale. It means "Severe congestion, demand exceeds capacity". One can infer that with the Woodland Road / Route 9 median closed, that PM traffic volumes at Woodland Road turning onto Cordville would be similar to AM volumes based on prior DPW studies. Therefore, this intersection would now operate at an acceptable class LOS E rating with the Route 9 median closed at the other end of Woodland Road.

2) The report estimates only 3% of the MBTA traffic will use Woodland Road. The MBTA will service riders primarily from the North, South and West. So, one can conclude that Woodland Road would not act as a traffic diffuser for inbound train station traffic.

3) Traffic flow on Route 85 introduced by Woodland / Route 9 median closing would be Southbound at a peak time of 4:45 to 5:45. The traffic flow on Route 85 from the MBTA would be Northbound during generator peak hour of 5:30 to 6:30. The directions are different and the peak periods are different. The impact of Woodland road traffic on Route 85 is significantly less than the impact from the MBTA station. Acceptable service levels on Route 85 would remain constant at a LOS E for all scenarios (with or without the train station, with or without Woodland Road traffic).

4) Since the Woodland / Cordville intersection is rated F one can deduce that the Woodland Road / Route 9 intersection is also rated F since it has a higher volume for Woodland Road and even a higher volume then Cordville for Route 9. The bottom line is that with the median closed that most cars would travel to Route 85 South from Route 9 East using a LOS B cloverleaf ramp at peak hour (LOS A at non-peak). These cars would be avoid crossing through two class LOS F intersections. Instead they would use one class B intersection with no crossover involved at all. *Two*, not one, intersections would benefit from the median closed. Also, significant benefits should be seen for a third intersection at the Oregon Rd / Breakneck Hill / Mass Turnpike overpass area.

I am patient. I will continue to be patient. However, the time has come to take a stand and close the median on Route 9 at Woodland Road. This will make Route 9 safer. On the basis of information in the MBTA study, Route 85 will be safer as well. The effect of closing the Route 9 median at Woodland Road would improve an unacceptable LOS F intersection (Woodland at Route 85) to an acceptable LOS E rating. Closing the median would still retain acceptable service levels along Route 85 between Woodland Road and Route 9. There are no more relevant facts to consider. Vote now, before a serious accident occurs, one of which may involve my children, my spouse, a neighbor, a Southborough resident or a resident of another community traveling through Southborough. Take advantage of this golden opportunity to make travel safer in Southborough. You will be providing a great safety service to Southborough. Please vote on this issue in an expedited fashion with no more delays. Thank you.

Russell A. Fustino

Copy:
- Kathy Bartolini, MBTA Committee
- John Boland, DPW
- William Colleary, Police Chief
- Trudy Coxe, Secretary of Environmental Affairs
- Peter Donahue
- Senator Robert Durand
- Representative Barbara Gardner
- The Middlesex News
- Kevin Moran, Roads Safety Committee
- Peter Phaneuf, Fire Chief
- The Southborough Villager
- Telegram and Gazette
- Wayne Theis, Town Planner
- Woodland Road Residents

Mr. Russell Fustino
189 Woodland Rd.
Southborough, MA 01772

Comment Letter No. 86

10 Heather Lane
Southborough, MA 01772

February 8, 1995

Secretary Trudy Coxe
Attn: MEPA Unit
Massachusetts Office of Environmental Affairs
100 Cambridge Street
20th floor
Boston, MA 02202

RECEIVED
FEB 1 [illegible] 19[illegible]
MEPA

Dear Ms. Coxe;

We would like to express our support for the proposed train stop in Southborough which is part of the EOEA 9154 Worcester Commuter Rail Extension. We have only recently moved to this community, and the accessibility of public transportation to Boston and Worcester was a positive factor in our choice of neighborhood. We now live within a half mile of the proposed train station and see no problems, only benefits, with its eventual location. (1)

We know that there is opposition to the facility. We have discussed the station with many of our new neighbors, and all have been enthusiastic about the location. We look forward to the opportunity to use it soon.

Sincerely,

Jane Fedorowicz

Jane Fedorowicz

Michael Golibersuch

Michael Golibersuch

Comment Letter No. 87

73 Marlboro Rd.
Southboorough, MA 01772

16

January 8, 1995

RECEIVED
JAN 19 1995
MEPA

Ms Trudi Coxe, Secretary
Office of Environmental Affairs
100 Cambridge Street
Room 2000
Boston, MA 02202

Dear MS Coxe,

As a resident of the Town of Southborough, I would like you to know that I'm very much in favor of the MBTA Station in my Town. 1

As you know residents of Southborough have to go to Framingham go get the Commuter Rail to Boston.

I have to leave my home at 6:15 to get the 6:55 train to Boston, if I want to be able to park in the "T" parking lot. If you are not in the lot by 6:40 you will have to find another place to park.

With trains station in Ashland, Southborough & Westborough it will help to reduce the parking problem in Framingham. I know that you have been told this by the "T" and do not need me to tell you it, but I have to let you know how I feel.

I have told commuters who live in Southborough to write you with their opinion of the "T" station in Southborough.

As I stated in the beginning of my letter I's VERY MUCH IN FAVOR OF THE SOUTHBOROUGH STATION.

Sincerely,

Anne M. Huff

Comment Letter No. 88

2/9/95

147 Southville Road
Southboro, Massachusetts
01772-1940

February 2, 1995

RECEIVED
FEB 7 1995
MEPA

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge St. - 20th Floor
Boston, Massachusetts 02202

Attention: MEPA Unit - Project 9154

Dear Secretary:

Please consider our comments concerning the proposed MBTA station in Southboro.

We purchased our antique home partly due to the rural character of our town. Over the years, the traffic has increased dramatically on our road due to the increased industry which has been built up in our neighboroing town, Westboro.

We have a small child and have worried frequently about the amount of cars and tractor trailer trucks on our street. Often it is difficult to pull out of our driveway due to the volume of traffic especially at the rush hours and the noise is becoming increasingly more disturbing.

OUr home is but a few blocks from the proposed station and we are half a block from the existing train line.

Some have said that our house values are going to increase as a result of a train station being placed in Southboro. That may or may not bue true but we and many of our neighbors are interested in the quality of life that we would like to lead NOW. We are thoroughly against the building of a station in our town, most especially in the proposed location, and think that the increased pollution, noise, traffic, and parking problems will bring quite a threat to our life as it stands now. We do not want to become more of a commuter town. We already have bus stops leading into Boston and a train station in Framingham.

Kindly consider our request not to build here.

Very truly yours,
Thomas H Little Judith Little

JUDITH and THOMAS LITTLE

Comment Letter No. 89

Burnam's Supper House

366 Pleasant Street
Ashland, Massachusetts 01721
508-881-1742

RECEIVED
MAR 7 1995
MEPA

March 3, 1995

Secretary Trudy Cox
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge St.
Boston, Ma. 02202

RE: EOEA # 9154 Worcester Commuter Rail Extension.

Dear Secretary Cox,

The Ashland portion of this project specifically, the north side of your "West Alternative", may have a significant effect on our property and business. This property has been owned by my family since 1938 and the restaurant that we operate, located at the same address, has been in operation since 1968. Although the 200 year old farm house that the restaurant occupies is not listed in any historical register, it is significant that the BAA Boston Marathon began outside our door for the first fifteen years of its 98 year existence. It is also worth mentioning that we have been seeking permits for expansion.

I have tried to attend all of the local rail committee and selectman's meetings concerning this project. Although my family generally agree that an MBTA station would be an asset to the community and our restaurant, I wish to present my ideas and concerns about our potential involvement.

Throughout this process, I have let it be known that the opportunity for a public/ private partnership between the MBTA and our restaurant would be a very positive step for both entities. Having been privy to the concerns of all parties involved in this local project, I am confident that the Ashland West Alternative would become a mecca for reverse ridership. However, I do have a number of concerns about the potential insensitivities of state agencies. Matters of design, shared parking, easements, land transfer, monetary compensation and protection from future land taking must be addressed. (1)

With several reservations, I am offering a "best way" approach for the north side of this alternative. My suggestions will have a dynamic effect on our property and business, and for that reason, I would expect to have extensive input and assistance from your design planners. Enclosed with this communication is an outline drawing based on your own publication. (2)

1. The property to the east of our establishment (labeled yellow "B") is currently "for sale". This parcel should be utilized for that very reason. If more property is needed for the project, and ours is considered (labeled green "C"), than naturally it should be taken from an east to west direction.

(3) 2. The issue of intersection failure at High St., Pleasant St., and Cordaville Rd. would be less problematic if the entrances and egresses are kept as far away from the intersection as possible. This would eliminate crossover traffic at the intersection.

(4) 3. The section of property that we intend to retain (labeled orange"A") must be permitted to occupy and operate according to the plans which have been offered to the town. This area does not include any parking and, therefore, it would be necessary to dovetail our parking needs with the MBTA's. I would estamate our parking needs will be over 133 cars throughout the summer months and less during other times of the year. Indeed, because of the potential reverse ridership possibilities during special events held at our establishment, parking needs may in even be less. Either way, since our primary purpose will be to offer social functions, and group events, our parking needs will be almost exclusively nights, weekends and holidays.

In closing, I would like to emphasize, that my primary goal is to protect our own interests first. However, it is my hope that if the West Alternative is chosen, I would hope that these ideas will help form the basis for a mutually beneficial relationship.

Sincerly,

Daniel M. Giargiari
Burnam's 1742 Manor Inc.
& 5-D Realty Trust

Comment Letter No. 90

(1)

NELSON HOLDEN
100 FOUNTAIN ST.
ASHLAND, MASS. 01721
TEL. 881-[illegible]308 881-4157

Owner Megunko Rd Lo 2+3
Middlesex Equip. Co.
Ash land Used Auto Parts Inc

March 6th 1995
Hon. Trudy Cox Sec
MEPA UNIT
Executive office of Environmental Affairs
100 Cambridge st
Boston MASS 02202

RE (EOA 9154 MBTA
Commuter Rail Ext Ash land

RECEIVED
MAR 9 1995
MEPA

NB

Dear Ms V Cox
and others:

I am vehemently opposed to the so called "East Site" for the following Reasons:

1) List of 14 Businesses and Residents that will be put out of business from Site East usage. I believe you have a list of the 14 Bzs. If not contact me & you will get it.

(1)

2) I will be put out of a business I conducted on my lot on Megunko Rd for 26 yrs. I have been in Bz in Ashland for 60 yrs & have no intention of moving & no desire to.

(1)

2 cont My business as well as 2 others

(2) cannot be displaced to another part of town. Zoning will prohibit this.

3) A (presumed) resident suggested if this were the case a plant in Ashland could be rezoned for us. This is an impossibility according to Officials. And I know it would never happen.

It would be done out of my lifes work to live in Peace.

Speaking of Peace, I take issue with a statement by the board that we (land owners weren't appraised of land potential Taking for fear it would upset us — ! of Course it would upset us or anyone, Wouldn't you? Also I am upset + feel disenfranchised

Comment Letter No. 90

3

3

3 because I and we were never informed of anything going on. (3)

I became aware of the situation a couple of weeks ago (third handedly) never any official notification of Rail commitee's decisions and or meetings. I was appraised of a meeting 2-3 weeks ago & I went.

: the Board chairman made a remark (statement) that previous attendance was little if any. I said how could I attend if I didn't know it was being held. I have never yet been able to get or see a plan of East & West sites tho I tried

The board said "We did not realize how many businesses would be affected by the proposed "East site" (4)

(2)

(4) How could the board make a decision proposing the East site in view of no investigation of "East Site" nor no investigation of the "West Site" either

I want a complete look over of the West Site

Incidently "West Site" has substantially less impact on Residents, buildings Old Age Homes, & the like.

(5) Land Owners of "West Site" are amenable to the land takeing. It would cost less & be a benifit to the town, not a detrement as in "East Site" location.

I reiterate I + 14 others of Mayfair Rd and lots of Resident across Railroad Vehemently object to East Site

Yours Truly Nelson & Helen.

5

PS

PS.

1) I again reiterate there's no possibility of Relocating in Ashland for 3 magor business in Ashland

1 - Class 3 License (Auto Parts)

3) Oil Tanks (Home delivery)

3) Trailer Hauling Bussiness

Above 3 according to Town Manager

Again Truly Yours
Helen Holden

PS. My typerwriter broke
& I can't type any letters in & side

Any Questions don't hesitate to call

.B

Comment Letter No. 91

CLAUDIA J. LEFTER
165 FOUNTAIN STREET
ASHLAND, MA 01721

February 8, 1995

RECEIVED
FEB 14 1995
MEPA

Ms. Trudy Cox, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, MA 02202

EOEA 9154 Worcester Commuter Rail Extension

Re: Objection to Eastern Location site

Dear Ms. Cox:

My family owns land which is currently being considered by the MBTA for rail station (located at the Eastern Location). As of the writing of this letter, our family has not been notified by anyone associated with this project that our land was under consideration. In fact, we found out from a friend on Monday, February 6, 1995. Just 3 days ago! (1)

I do not know what the specific process is, but I am sure that legally our family should have been notified. Also, since we were not aware that our property was being considered, we have not had an opportunity to attend local or public meetings to be heard.

I contacted the two abutting property owners, and they also were not notified either (William Leacu and Edward Camille). We are located on Megunko Road in Ashland.

Therefore, we object to the Eastern Location as the site for the rail station in Ashland.

Sincerely,

Claudia Lefter

Claudia Lefter for
Nelson W & Martha E. Holden
136 Fountain Street
Ashland, MA 01721

Comment Letter No. 92

COPY
SENT 3-8-94

March 7, 1995

Honorable Trudy Cox, Secretary
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Re: EOEA 9154, MBTA Worcester Commuter Rail Extension/Ashland, MA

Dear Ms. Cox:

Although we are in favor of a railroad station in Ashland, we write to express our deep concern and disapproval over the proposed "East Location" for Ashland, MA.

- The Megunko Road parking lot will severely impact and/or eliminate fourteen existing businesses. Most of these fourteen businesses service the local Ashland area. Therefore, the proposed East Location would essentially put most of these companies out of business. This action would then reflect negatively on the downtown area merchants from whom these businesses purchase supplies, food, and other services. One statement repeated by the town of Ashland is the hopes that a railroad station will encourage business generation within the town. The "East" location defeats this goal by the elimination of fourteen existing businesses. (1)

- As we are in the negotiating process with the EPA, in regards to the Nyanza Superfund Site, it is our understanding that we will grant the EPA perpetual access and easements to our lands should the EPA require additional testing or remediation. This perpetual agreement includes all land within the "East" location on Megunko Road.

- Since the mid-1980's, there has been a "building moratorium" issued by the Ashland Board of Health for the Nyanza property. This ban was never officially lifted as far as we know.

- There are dozens of residential homes on the north side of the railroad tracks from Megunko Road. The maps provided in the draft EIR do not show the homes on the east end of Pleasant Street, nor the small streets of Forest Avenue, Metcalf Avenue, or Tilton Avenue. I spoke to many residents of this area and they, also, were not notified that this proposed railroad station was being considered so close to their homes. The residents we spoke with are very upset with this proposed plan. (2)

- There are many errors/misleading statements in the draft EIR. I briefly noted some of these inconsistencies, and have attached a copy. I concentrated only on the "East" Location. Our concern is that decisions may be made based on incorrect data.

- On February 27, 1995, we attended a local Rail Committee Meeting at the Town Hall in Ashland. We were told that the committee only received updated plans for the "East Location", when the draft EIR states several times that both "East" and "West" will be thoroughly investigated. (3)

- The landowners directly affected by the "East Location" parking lots, and the abutting residential homes were never formally notified that this land/area was being proposed for a rail site. The landowners on Megunko Road found out "through the grapevine" on/about February 6, 1995, and the residential neighborhood families are just beginning to find out as of this past weekend (February 25, 1995). (4)

- The "East" location is approximately 1/10 mile from the intersection of Cherry Street and Park Road, and approximately 2/10 mile from the Main Street RR crossing. Within these two locations there are two elderly housing complexes. The Ashland Board of Selectmen are vigorously pursing Conrail to find ways to reduce the existing train noise that currenly have a negative impact on the elderly residential homes. (These homes stand adjacent to the railroad tracks). To add a MBTA rail station so close in proximity to these housing units will only intensity the current embittered situation. (5)

- The East location station will be very close to the Cherry Street and Main Street railroad crossings. The closeness may further obstruct heavy rush hour traffic by the mere fact the MBTA trains (heading west) will begin to slow as they approach the "East" location. Also, a fire station sits north of the railroad tracks adjacent to the Main Street railroad crossing. The less time the railroad crossing gates are down the safer the town, in general. (6) (7)

- The "East" location negatively impacts more individual people than the "West" Location. The West location will take no businesses and will not directly affect any residential homes. Indeed, the "West" location will positively impact that area of town, according to land owners D. Giargiari and R. Gaynor, whose land is being considered for the "West" location. The West location is further from the downtown area, further from the elderly homes, further from the residential homes, will not take fourteen existing businesses away, and is not part of the Nyanza Superfund Site. (8)

- No official notification to any landowners on Megunko Road or to abutters to East location. Most found out early February 1995. We believe we have been denied due process. We have not had the opportunity to attend all local MBTA rail committee, Board of Selectmen, CAC meetings associated with this proposed location. The past few weeks have caused tremendous stress to all landowners, abutters, and the surrounding neighborhood due to the absence of proper notification. This is wrong.

(9)

We appreciate this opportunity to present our opposition to the "East Location". We look forward to having an MBTA rail station within Ashland, but not at the monumental sacrifice that the "East Location" will bring to many, many families and the many businesses that operate on Megunko Road.

Sincerely,

James L. Lefter

Claudia J. Lefter

William Leacu

Barbara Leacu

Edward Camille

Nelson Holden

Martha Holden

William M. Leacu Jr.

Cynthia J. Leacu

Attachments: Positive Impact West Location versus East Location
Petition by Ashland Residents objecting to East Location
List of Errors/Misleading Statements EOEA No. 9154 Draft EIR

Comment Letter No. 92

POSTIVE IMPACTS FOR WEST LOCATION VERSUS EAST LOCATION

- No displacement/elimination of existing fourteen businesses
- No negative land takings
- Minimal property tax loss
- No ground or groundwater contamination from Nyanza
- No interruptions associated with future Nyanza remediations
- No potential health risks during MBTA rail construction
- No MBTA liability from riderships associated with health risks (Nyanza)
- Further away from elderly housing complexes
- Further away from downtown business district - lessen traffic woes
- No problems associated with abutting neighborhood homes (noise, lighting, vibration, or vandalism)
- No blocking Megunko Road
- Decrease amount of time railroad crossing gates are down (further away from railroad crossings - Cherry Street, Main Street)

Comment Letter No. 92

Errors/Misleading Statements
EOEA No. 9154, Draft Environmental Impact

1. Chapter 1, page 403, East Location. "This location was chosen based on its potential parking capacity, availability of vacant land, proximity..."

Chapter 3, page 32, East Location. "The site lies in an industrial areas, portions of which are currently occupied by small businesses." (10)

Comment: Not vacant, all land is occupied by small businesses

2. Chapter 11, page 14, describes Pleasant St location as "undeveloped land and one (or two) commercial properties".

Chapter 11, page 15, (para. 2), East Location. "three industrial parcels". (11)

Comment: We are existing "business properties", too!

3. Chapter 11, page 15, East Location, "partially within groundwater plume"

Chapter 16, page 1, para. 3, East Location, "lies within groundwater plume."

Comment: East Location - Megunko Road - within groundwater plume.

4. Chapter 11, page 15, para. 5, West Location. "due to Nyanza related issues, High St/Split configuration (D) will continue to be carried forward.

Chapter 11, page 16, West Location. "no further analysis of this option will be done at this time."

Chapter 16, page 1, West Location. "pending environmental (Nyanza) issues, Ashland station West is also be evaluated."

Comment: Why were updated maps only sent of East Location to local MBTA Rail Committee (presented at their meeting on February 15, 1995), when two out of three sections above spoke of further evaluation of West Location? (12)

5. Chapter 16, page 1, East Location, "Megunko Road parking lot abuts Nyanza Superfund. (13)

Comment: East Location within Nyanza Superfund site.

Comment Letter No. 92

6. Chapter 16, page 4, East Location. "total of 18 residential buildings were found to be within noise impact distance."

(14)

Comment: First, they are homes, not buildings. I know of no other railroad station that abuts residential neighborhoods. None of these people have been properly notified. What kind of noise?

7. Chapter 16, page 47, East Location. "Phase II is currently underway and includes the extraction and treatment of groundwater."

(15)

Comment: This has not been constructed yet. Refers to the groundwater remediation of Nyanza's plume. Phase III, excavation of "eastern wetland" has not begun yet (Nyanza Superfund site).

Comment Letter No. 93

Ellen L. Giargiari
128 Pleasant Street
Ashland, MA 01721

RECEIVED
MAR 3 1995
MEPA

February 28, 1995

Dear Ms. Cop-

My husband and I have lived at 128 Pleasant Street in Ashland since 1945. We own our home and have seen our street grow from a quiet rural one to a very busy one, as it is now not only a thruway to Route 9 and 495 but also a truck route. Traffic is very heavy. I guess I am saying I am pleading with you not to allow the MBTA station on the proposed site. Please let us enjoy the rest of our lives (we are 80 & 79) without any more confusion and traffic.

(1)

Respectfully,
Ellen L. Giargiari

Comment Letter No. 94

RECEIVED
JAN
MEPA

January 6, 1995
Friday

Ms. Trude Cox
Secretary, Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Fax: (617) 727-2754

RE: Worcester Commuter Rail Extension Project (EOEA #9154)

Ms. Cox:

Thank you very much for including me in the distribution list of Private Groups/Others and for having a copy of the November 1994 revision of the DRAFT Environmental Impact Report of the Worcester Commuter Rail Extension Project (EOEA #9154) mailed directly to me.

While I have a long list of technical points in regards to this DRAFT that I might spend the time and effort to submit at a later time, I have a more basic question I would ask you or the appropriate person to address immediately.

On page 3-50 of volume 1 of the DRAFT report, Table 3.6-3 lists the Net Annual Cost of the Worcester [Commuter Rail] Extension Project as $10,308,332. On page 4-14 of the same volume, Table 4.2-2 lists the Net Annual Cost of a Commuter Bus Alternative as $(1,763,084). The parentheses denote a negative cost - (i.e. a profit). That is to say that the Rail version would be a $10.3 million cost/deficit each year whereas the Commuter Bus Alternative would operate at a $1.7 million profit/surplus every year to the benefit of the Commonwealth/MBTA. The capital cost for the Rail Extension Project so called preferred alternative is $112 million (Table 3.6-1 pg 3-49) versus the Bus Alternative at $28.4 million (Table 4.2-1 pg 4-14). (1)

The Commuter Bus Service Alternative (section 4.2) evaluated "approximated the performance standard" of the proposed commuter rail services so called preferred alternative and assumed "the same volume of patronage". The Bus alternative has tremendously smaller construction and operating impacts (particularly noise and vibration) than Rail as well as "VOC emissions [that] are very close" (Section 5.5 Analysis Results pg 5-14).

How can any sane person with there wits about them pretend that Rail should be selected or that any further time, money, effort or thought should be given to it? (2)

What's worse, I believe that corrections to the Net Annual Cost comparisons will show the Rail Alternative to be <u>even less</u> economically favorable.

Thank you very much for your time and attention. I would greatly appreciate a prompt response to know whether the "fix" is in (Rail is a sure bet) or whether the decision will be based on the facts. I don't want to waste my time and breath if the matter is already essentially closed.

Urgently yours,

John Woodward (508) 435-5026
54 Lake Shore Drive
Hopkinton, MA 01748-2712

Comment Letter No. 95

Andrew & Teresa Boyce
281 Cedar St.
Hopkinton, MA 01748
Tel (508) 435-8776

February 2, 1995

RECEIVED
FEB 1 1995
MEPA

Mass. Executive Office of Environmental Affairs
100 Cambridge St. - 20th Floor
Boston, MA 02202
Attn.: MEPA Unit

Re: EOEA-#9154
DEIR- Worcester Commuter Rail Extension

Secretary Trudy Coxe:

We are writing in order to express our opposition to the siting of a commuter rail station on the Southborough/Hopkinton border, directly across from our home. It seems the decision to extend commuter rail to Worcester is based more on politics than on practicality. The MBTA has yet to show that this project results in a significant reduction in air pollution. Politics make it inevitable that a station will end up next door to our house. Here are some of our comments: (1)

• The proposed pedestrian overpass is unacceptable as it is aesthetically incompatible with the character of the neighborhood. The light spillover from this ugly 30 foot high concrete and steel structure is maximum. There is already a pedestrian underpass running under the tracks which could easily be reactivated. Security issues could easily be addressed with adequate lighting, a wide tunnel and 360 degree mirrors. The light spillover from a tunnel would be minimum. In addition, the design of the ramps forces a person in a wheelchair to traverse 360 feet of ramp in order to cross 14 feet of track. (2) (3)

It is the MBTA's stated policy that for security reasons they will not build underpasses. It seems ironic that the MBTA has insisted that no neighbors should be concerned for their security, yet they insist on maintaining this policy. (4)

(5) • Southborough has mentioned building a jogging track around the Cordaville Mill Pond. More than half of the pond is within the Hopkinton town border. This would require the taking of a section of our property (unless they build the track on stilts) as well as the construction of two bridges over the river. Our loss of privacy as well as the destruction of our view of the dam would be tragic.

(6) • Currently the MBTA, the State and the Town of Southborough view this station as affecting Southborough only. There is no "glass wall" running along the town border, in fact our properties have more frontage abutting the proposed station than any in Southborough. Hopkinton residents will suffer the same noise, air and light pollution, as well as traffic, privacy and security issues. Any steps at mitigation must include the residents of Cedar and Lincoln streets.

(7) Because the MBTA will be purchasing the Mill Pond, Hopkinton should never have been excluded from representation on the C.A.C.. Hopkinton's one non-voting member, as a resident of Fruit St., can not be considered impartial. Fruit Street is a candidate for the alternative Regional station.

(8) • We are concerned that reconstruction of the Conrail bridge and Rt. 85/Southville Road intersection will either lower the road or raise the tracks. This would allow large truck traffic to pass through which would normally have used Rt. 495.

(9) • Increased access to the Sudbury River and Mill Pond are among Southborough's ambitions. We agree with this concept, however, we are concerned that this will increase our noise and light pollution - especially during the winter months when the trees are bare. The parking lots will be lit with high intensity lights until 1:00 A.M. Mitigation in the form of tall conifer trees as well as light poles kept to a minimal height must be part of the design.

(10) • Some residents of Cordaville and the MBTA have suggested building a multi-level parking garage on the south side of the railroad tracks. The MBTA's own ridership projections show the parking lots to be oversubscribed by more than 100 cars on the day they open. There will be tremendous pressure on the MBTA in the future to expand the facilities. While the garage option is not currently being investigated, we would like assurances that it will not be built in the future.

Comment Letter No. 95

• Southborough has asked the MBTA to reserve all 90 spaces on the north side for their residents only. They rationalize that if they have to put up with the traffic and pollution, they ought to be granted reserved parking. Along those same lines of thinking, Hopkinton should be granted 90 spots in order to compensate for the disruption of Cedar St./Lincoln St. residents. We object to the use of state bond money being used to create exclusionary parking. Southborough should purchase, develop, and maintain the lot if they want to exclude residents of surrounding communities. (11)

• The MBTA has recently changed it's mind and plans no weekend service. For most of the residents of both towns, the only time they would use it is on weekends. We should insist that weekend service be a condition upon which the site is approved. (12)

• The MBTA has done an inadequate job of studying the option of a regional station vs. multiple commuter rail stations. Please request the MBTA to seriously consider a station which would do the most good for the most people. (13)

• Electrification of the commuter rail should be the ultimate goal of this project. Please force the MBTA to build the stations in such a way as to not preclude the future electrification of the tracks. Some day the technology may exist and it would be a shame if the stations were incompatible. (14)

We ask you not to make any decisions from an office in town. Please come out and walk the site on both sides of the river. Feel free to call us or knock on our door and view the proposed station from our side of the tracks.

Thank you for hearing our comments.

Sincerely,

Andrew & Teresa Boyce

Enclosures

Comment Letter No. 96

KEITH K. DAVISON
37 Hastings St., #206-ME
West Roxbury, MA 02132
(617) 327-5761

N 3

March 3, 1995

RECEIVED
MAR 7 1995
MEPA

Trudy Coxe, Secretary, EOEA
attn: MEPA Unit
100 Cambridge St., 20th Floor
Boston, MA 02202

fax 727-2754

Re: EOEA #9154 - Worcester Commuter Rail Extension DEIR

This is a troubling project. It seems to be founded on a defective agreement with CLF: to proceed if the project is at all feasible. No matter what the expense or impact on other infrastructures, such as bus transportation. No matter whether this is the wisest of most effective way to improve the public transit system. (1)

Although heavy rail can be very efficient when the trains are full of passengers, it has high overhead (starting the trains for the day) and is quite awkward and inflexible (long trains are run for all load levels because shortening them is much too much trouble; use of a single track for bi-directional traffic must be carefully planned and coordinated). I am baffled that we do not have single-car, one-operator, self-powered vehicles, just like buses, to use the heavy rail system during times of low traffic, so that passengers could get decent service, which would increase usage... (2)

At least this CAC seems to have empowered itself, and engaged in meaningful discussion. As usual, they were frustrated by lack of responsiveness from the MBTA. I have had difficulty learning about meetings of this CAC.

To get the full environmental benefit of commuter rail, we desperately need better facilities at the stops for people to wait out of the weather, good bicycle parking, and an effective local shuttle bus system so commuters don't have to drive their cars to the train, generating start-pulse pollution, congesting roads, and occupying a parking space all day. We need much greater efforts to allow bicycles to be carried on the trains. (3)

No mention of effective use of technology to let waiting passengers know where the trains actually are, whether they are on schedule, and how long they will have to wait for trains that are late. (Simple, informative platform announcements are almost never made at intermediate stations.) Or modern technology to keep trains from colliding but with minimal spacing. (4)

What about the extra pollution created by all the cars idling in the station parking lots to keep people warm in the winter and cool in the summer! (5)

It's wonderful to take traffic impact so seriously, esp. detailed local impacts, but 565 pages is definitely too much. Who can comprehend this much detail? We need effective over-views, and effective public access to whatever level of detail is of actual interest to an enquirer: we need an on-line graphics-based system with effective public access. Perhaps this type of traffic study could be effectively distributed on computer disk usable on generally available PC's.

We have reached the point where we need to re-consider the environmental impact (and financial etc) of the MEPA process itself. Twelve pounds of documents! Prepared, published, and distributed at what expense? How many copies? How many distributed copies never seriously looked at by anyone? Over eight dollars each just to mail them out! But we have not achieved a commensurate amount of effective public process. We need more accessible, effective, interactive, meaningful public participation. MEPA should be pioneering the use of the Internet to upgrade this process, and work with the Massachusetts library inter-loan system for more efficient distribution of large documents. (Just sending the documents to libraries is not effective. In general, they don't want them, don't know what to do with them, patrons don't ask for them, and patrons with a real interest aren't allowed to check them out!)

-Keith K. Davison

Comment Letter No. 97

LATE COMMENT 3/7/75

N3

Dear Sir,

This is in protest against having a depot and parking lot in Westboro. No recommendation for building, patroling or maintaining the property. Seeing as how the tracks and surrounding area are now maintain and the havoc with the East Main Street bridge I do not feel we need any more harassment to our town and for our citizens. (1)

We should not be forced to take on any added burden. (2)

Our pocketbs have been picked clean — brazz off.

Yours truly

Dorothy McMahon

Comment Letter No. 98

we do need a tip B near by — but not Otis Street — too dangerous on Fisher, Mill & Maynard Streets already!

Jackie Adams

1

site costs and increased traffic on East Main Street, even though this site would have the most favorable impact on revitalizing the Westboro downtown area. In the 18 years that we have lived in town, the traffic on East Main Street has always been horrible, but this has not stopped the construction of the Willows, the Fallon Clinic, choose a site based on what's best for the town and the town's residents. Selecting the Smith Valve station site with a projected ridership of 22 Westboro residents, the loss of taxable property, and no revitalization of the downtown area, does not seem to be in the town's best interest.

Recently the Transportation Department has approved liability for transients or accidents caused by the elevation of the platform which will abut their property. There are also power lines that run next to the tracks, how will they affect the platform . . . this issue is never addressed. What liability does the town face?

Westborough schools are the pride of the entire community, these schools will be affected residents.

Please, if the MBTA is to direct a station to this area and money is to be spent, let it be for a Regional Station at Route 495 and Route 9. There is time for the community to comment on the present DEIR by writing The Honorable Trudy Coxe, Office of Environmental Affairs, 100 Cambridge Street, 20th Floor, Boston, MA 02202. It is important to mark your letter with Environmental Report EOEA #9154 and to send a copy to the Selectmen, *your letter must be received by March 9th.*

Thanks for listening.

Lou and Maureen
Jankauskas
Westborough

Comment Letter No. 98

TO THE EDITOR

Re: DEIR for Commuter Rail Extension Project

Dear Editor:

We are writing in regard to the DRAFT Environmental Impact Report (DEIR) for the Worcester Commuter Rail Extension Project. The DEIR fails to adequately address the basic issues of site construction, noise and vibration abatement, safety, liability, and security for the Smith Valve Station and the Town of Westborough.

Originally, the Westboro Station was proposed to be located on Fruit Street, but due to local opposition, other sites were evaluated and the Smith Valve Site selected. Use of the downtown station was deemed unworkable due to site costs and increased traffic on East Main Street, even though this site would have the most favorable impact on revitalizing the Westboro downtown area. In the 18 years that we have lived in town, the traffic on East Main Street has always been horrible, but this has not stopped the construction of the Willows, the Fallon Clinic, Post Office, etc. and the development of the Rogers property and the Senior Citizen housing. In terms of traffic a small station geared with an estimated 22 Westboro riders would have less impact than the Bodyshapers Gym, 50 East Main Street, where about 100 cars are often parked. Due to the train schedule, most of this traffic would occur prior to Westboro's "Rush Hour" in the morning and after it in the afternoon. Based on the schedules in the DEIR only two trains in each direction would be during peak traffic hours in Westboro. The cost of the site for the MBTA should not be a factor in Westboro recommending a station site. Westboro should choose a site based on what's best for the town and the town's residents. Selecting the Smith Valve station site with a projected ridership of 22 Westboro residents, the loss of taxable property, and no revitalization of the downtown area, does not seem to be in the town's best interest.

Recently the Transportation Department has approved study for a Regional Station at Route 495 and Route 9. The MBTA should be encouraged to do what is best for Westborough and the development of a Regional Station would provide a strong ridership to Westborough from Worcester and the Boston area. This would be a successful program for this area, businesses would locate and stay permanently. Too often businesses start out in this area and find we lack resources that they could receive closer to Route 128 and as they grow they relocate, our tax incentive has not made a difference to these companies.

There is no mention in the DEIR of the residents on the south side of the station and how they will be protected from noise, air pollution and liability for transients or accidents caused by the elevation of the platform which will abut their property. There are also power lines that run next to the tracks, how will they affect the platform... this issue is never addressed. What liability does the town face?

Westborough schools are the pride of the entire community, these schools will be affected Smith Valve Station. The town buses pick up students at regular intervals on Fisher Street, Mill Road, Maynard Street and Arch Street. These streets are already known as cut throughs to reach BJs, Sam's, Stop & Stop, as well as daily traffic to Shrewsbury and Worcester. The MBTA provides no funding for widening of streets or providing sidewalks. There is a safety factor involved as these streets are narrow and have no sidewalks, one adult lost their life on Fisher Street in 1994. If dollars are to be spent for safety it will come from Westboro. We will be responsible for the safety of our community and be allowed to pay the assessment the MBTA will establish, all for 22 Westboro residents.

Please, if the MBTA is to direct a station to this area and money is to be spent, let it be for a Regional Station at Route 495 and Route 9. There is time for the community to comment on the present DEIR by writing The Honorable Trudy Coxe, Office of Environmental Affairs, 100 Cambridge Street, 20th Floor, Boston, mark your letter with Environmental Report EOEA #9154 and to send a copy to the Selectmen, ***your letter must be received by March 9th.***

Thanks for listening.

Lou and Maureen
Jankauskas
Westborough

Comment Letter No. 99

Department has approved funding for a feasibility study for a Regional Station at Route 495 and Route 9. I trust this study will have a very positive outcome. There is a large office park here as well which would benefit from a train station here. (1)

Thank you for your time,

Sincerely,
a concerned resident,
Julia McTiguefaccabo

cc: Kristina N. Allen

DEIR RESPONSES

RESPONSE TO COMMENTS ON THE NOVEMBER 1994 DEIR

Comment Letter No. 1

EOEA DEIR Certificate (3/16/95)

Comment 1-1

"The DEIR was pre-reviewed by the Citizens Advisory Committee (CAC) and comments from the CAC were included in the DEIR. Generally, these comments appear to be comprehensive, accurate, and fair. They should receive full consideration in the FEIR."

Response

CAC comments, as well as those from others, have been thoughtfully considered. Responses have been or will be provided in either the Track and Layover FEIR (FEIR #1), this FEIR #2, or the pending FEIR #3 for stations in Westborough, Southborough, and Ashland in accordance with the discussion found in the above introduction.

Comment 1-2

"Citizens in the municipalities affected by the project have shown a high level of interest in this project, as well; their comments are referenced in this Certificate and listed below. Sensitivity to these concerns should be demonstrated in revisions and refinements to the project design and siting, in the operational plans, and in the commitments to the environmental mitigation proposed in the FEIR."

Response

The MBTA has considered seriously the comments from citizens and municipalities thus far in the environmental review process for the Worcester Commuter Rail Extension Project. Where possible, revisions to the project have resulted, and mitigation commitments have been expanded based on such consideration of comments. Two examples include the expanded noise mitigation measures proposed for the layover facility (i.e., use of an air compressor overnight to maintain brake pressure, thereby

reducing morning idle time by up to 10 minutes per locomotive), and the postponement of decisions on station locations in Westborough, Southborough, and Ashland to maximize community input in the decision-making process.

Comment 1-3

"The FEIR should provide sufficient information to demonstrate that the MBTA will be able to operate this project without adversely affecting its services elsewhere."

Response

See Section 2.2 of this FEIR #2.

Comment 1-4

"According to the DEIR, environmental impacts appear to be somewhat less extensive with busing due to the fact that station facilities would be limited to parking. However, the impacts of the alternatives have not been quantified for comparative purposes and the information provided in this section of the DEIR allows only limited understanding of this matter."

Response

The MBTA has assessed alternatives only to the point of determining whether Worcester Rail was infeasible under 310 CMR 7.36. Since it is not infeasible, no alternative to the project may lawfully be considered under this regulation or under the Massachusetts SIP, of which it is a part.

Comment 1-5

"The ridership projections for commuter rail and bus services were estimated based on census and other data for the cities and towns in the transportation system capture areas. Certain assumptions were also made about transportation networks and mode choice factors (p. 4-4) to arrive at the ridership estimates. Were these same assumptions used in the ridership study in Section 5?"

Response

The background transportation network and mode choice factors used in the current analysis are the same as those used in the Feasibility Study (p.4-4). However, the trip table which determines the total demand regardless of mode is different now because of the change in demographic assumptions as well as the use of the 1990 Census Journey-to-work data in the demand estimation.

Comment 1-6

"What mode choice factors were used for rail and bus services and how were those factors used in the analysis?"

Response

The mode choice factors used in this analysis were developed from a binary mode choice model which uses the relative utilities of travel times and travel costs of transit and auto modes in determining the mode choice probabilities. For a given origin to a destination, the model compares the travel times and travel costs by both auto and transit modes and estimates the mode choice factors. Downtown parking costs, auto operating costs, transit fares, auto availability, walking time and waiting time are some of the important variables that go into the mode choice decision. In the current analysis, the mode choice factors vary anywhere between 11 percent and 67 percent depending on the town of origin.

Comment 1-7

"What is the degree of accuracy of the ridership projects, given that 1980 census data were used?"

Response

The feasibility study used the 1980 Census data to estimate the 1987 base year trip making. This base was later used to determine the future year work trips. However, in the current analysis we had access to the 1990 U.S. Census data and therefore we were able to reestimate the base year total trips from the study area. The future projections based on these new base year trips have proved to be quite accurate. For example, our projections at Worcester Station for the year 1996 is 370 inbound trips per day assuming all five intermediate stations. A survey conducted in February 1995 showed a ridership of 300 boardings per day at Worcester Station. Recent observations indicate that ridership has been increasing steadily since then. Though the current interim service is not comparable to the basic service we assumed in the analysis, it can be observed that the ridership projections are reasonably close to the observed counts.

Comment 1-8

"Section 4 of the DEIR concludes with a comment that the Worcester Extension project is required by the Department of Environmental Protection (DEP), air quality regulations (310 CMR 7.36 (2) (c) 2), unless substitution of an alternative becomes necessary because the engineering, environmental impacts, or economic impacts cause the project to be infeasible. Although it appears to be unintended, the limited text leads to the question the

CAC has raised. Is this significant state transportation project justified primarily because it has been found to be "not infeasible?" A more thoughtful response (which may take note of recently published ridership data) is needed in the FEIR."

Response

With all due respect, the language of 4.4 is not "inadvertent." MEPA is, in part, about meeting regulatory standards. The language of 4.4 of the DEIR, in part, addresses the project in terms of DEP's regulatory standard at 310 CMR 7.36 concerning possible alternatives to it. Alternatives may be pursued if Worcester Rail proved "infeasible." Since it has not, no substitute project is warranted.

The remaining language of 4.4, as well as language throughout the DEIR, thoughtfully explains why the MBTA feels Worcester rail is far from just "not feasible." The MBTA believes this feeling is entitled to the Secretary's deference, since mass transit planning for Metropolitan Boston is the MBTA's responsibility under law, while the Secretary's responsibility under law is to evaluate and see to the mitigation of a projects' environmental impacts. This deference should be all the greater in light of DEP having required the Worcester Rail project by regulation, EPA having added it to the State Implementation Plan, and the Legislature having generously funded it, as a result of those agencies respective deliberative processes, all of which offered many opportunities for public participation.

Comment 1-9

"I also note that the MBTA will be conducting a report to the Legislature on this issue [Regional Station Alternative] in the near future, as directed by the recently passed Transportation Bond Bill. I request that the MBTA carefully consider the concerns and arguments raised during this review. I also request that the report to the Legislature be made available for public comment (through a notice in the Environmental Monitor) and that the (next) FEIR report on the results."

Response

Notice of availability of the *Regional Station Feasibility Study* appeared in the *Environmental Monitor.* A brief summary of the study is in Section 3.3 of this FEIR #2; a further presentation will be in FEIR #3 which will report on the proposed Westborough, Southborough, and Ashland commuter stations.

Comment 1-10

"It is unclear why the results for the Alternate 1 and 2 were not also presented here to understand the effects of unconstrained parking and the inclusion of a regional station on ridership. This information should be included in the FEIR."

Response

Ridership estimates for Alternate 1 and 2 are included in the CTPS Ridership Projections in Appendix D of this document. Since parking will be constrained at 420 in Southborough and a Regional Station is not part of the proposed project, Alternate 4 is representative of the proposed project.

Comment 1-11

"The interim service has been operating for several months and ridership has presumably stabilized. The FEIR should evaluate the accuracy of the ridership projections for Worcester based on actual ridership data. If possible, the conclusions drawn from this assessment should be extrapolated to the intermediate station ridership projections to verify that the programmatic design for those stations is sound."

Response

There were no ridership estimates for interim service to compare against. The MBTA has made something resembling the Secretary's proposed intermediate station calculations, but for several scenarios, since, in the end, not all the intermediate stations may be built; depending on the scenario, ridership is higher or lower overall and at various stations. Overall, the accuracy of the CTPS ridership projections are considered to be valid. See updated ridership in Appendix D.

Comment 1-12

"The impact that the interim service has had on other HOV modes, in particular bus service, should be assessed in the FEIR, as per the CAC comment."

Response

On February 16, 1995, the MBTA surveyed all riders from Worcester on the Interim Service. This survey showed that less than 16% of the Interim Service Riders were drawn from bus services. Since Worcester has more bus services. Since Worcester has more bus service than other potential stations on the Worcester Commuter Rail Extension, it was conservatively assumed that, for the entire extension, 15% of the riders would be drawn from other HOV modes - primarily from buses.

Comment 1-13

"Because of expected noise, vibration, odor, and air quality impacts, layover facility siting avoids residential areas, wherever possible. However, there is an elderly housing complex, the Mt. Carmel Apartments, located on the north side of Shrewsbury Street, within 300 feet of the centerline of the layover facility. The DEIR predicted that these apartments may be exposed to an L_{dn} of 70 dBA under worst case conditions. However, no noise mitigation is planned, because the report indicates that mitigation is only necessary when noise impacts reach or exceed 74 dBA L_{dn}. This conclusion should be explained in terms of ambient noise levels, the applicable noise impact criteria used to draw this conclusion, and the location where the noise impact was measured."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Ambient noise levels, measurement site location, and noise impact criteria are discussed fully in Section 6.3 of the Final EIR.

Comment 1-14

"Reducing train idling time is an effective way to limit locomotive noise impacts. The MBTA has minimal ability, however, to control idling in cold weather. Consequently, this mitigation measure would be unreliable. Electric power sources provide an alternative way to control idling noise. However, the report provides no assurance that this alternative source of power will be used for this purpose. Additional discussion of this issue should be provided in the FEIR to better understand existing applications, the potential effectiveness in controlling auxiliary engine noise and the degree of noise attenuation that could be achieved at sensitive receptors, such as the elderly housing complex."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The layover facility will be equipped with electrical power supply to maintain heat overnight. Idling of locomotive engines, either main or auxiliary, will not be necessary except during the required start-up and shut-down periods. See Section 6.3 for full discussion of layover operations.

Comment 1-15

"The results of the pure tone analysis indicate that the DEP guideline, i.e. the peak exceeds each adjacent octave band sound pressure level by more than 3 dB, will be exceeded for the older 1000-series locomotives. The MBTA is purchasing new locomotives, i.e. 1050 series, which will not have as great an impact, but the phase out of the older locomotives is unspecified. Therefore, the FEIR should consider the frequency of use of the noisier locomotives at initiation of service and long-term to more accurately forecast pure-tone exceedances."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The discussion of noise at the layover (in Section 6.3) describes the probability of older locomotives laying over and the relative effects on noise environment. While the 1000-Series locomotives currently represent about one third of the MBTA fleet, the pending addition of 26 new locomotives will result in 1,000 series being less than one fourth of the total. Further, the average age of the 1000-Series locomotives is 17 years, and retirement from service can reasonably be anticipated within ten years for many of these units.

Comment 1-16

"The FEIR should consider the feasibility of operating only newer train sets"

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The 1000-Series locomotives are 17 years old and had their mid-life rebuild at approximately 12 years. Between their age and the addition of new locomotives, their percentage of use in the fleet will continue to decline. Due to scheduling and service requirements, no guarantees can be made with respect to limiting the use of the older locomotives to Worcester.

Comment 1-17

"The site plan of the layover facility, Figure 9.0-1, also shows that the site is being used as an interim station with platforms, a passenger drop-off area, and a 177 parking space

lot. The FEIR should explain what will happen to the station facilities after Union Station is developed."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Upon completion of the Union Station project, the only portions of the Interim Station which are anticipated to be removed are the access platform and canopies. All other facilities including parking lots, lighting, stairways, sidewalks, and landscaping will remain and serve Union Station as supplemental parking facilities. Existing signing will be replaced as required. The MBTA will coordinate with the Worcester Redevelopment Authority during transition to Union Station.

Comment 1-18

"...the FEIR should include any plans for future remodeling of the layover facility after Union Station is complete."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

No future remodeling plans of the layover facility are anticipated after Union Station is complete, with the possible exception of redesignating additional employee parking areas for Layover personnel, if required.

Comment 1-19

"The FEIR should also specify the noise mitigation measures that will be undertaken during construction of the layover facility. Those described in the DEIR (p. 9-10) seem appropriate, but no commitments have been made."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

No significant noise impacts were identified from construction activities for the Layover facility. Section 1.07 of the Standard Specifications used by the MBTA for construction contracts includes noise control measures, which are described in Section 6.3 of the FEIR. These measures will be employed and will minimize construction noise effectively.

Comment 1-20

"As a result of the addition of a double track along a seven mile segment from Westborough to Worcester, there will probably be additional drainage, wetlands, wildlife, and archaeological resource impacts. The rail embankment widening and fencing will cause impacts too. However, the DEIR indicates that the areas of new disturbances will not be identified until final design. This raises the concern that the public review may not disclose the extent of the project-related impacts to the natural environment because the FEIR is due at about the 60 percent design stage. To the extent possible, these impacts should be described fully in the FEIR and the report should demonstrate that an effort was made to avoid and minimize damage to resource areas."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Drainage, wetlands, and wildlife impacts along the seven mile segment are described fully in sections 4.4 through 4.7 of the FEIR and indicate little or no impacts associated with construction of the 7 mile segment. In addition, Notices of Intent have been filed with the Conservation Commission in each of the individual towns along the project corridor and the review process will in general occur concurrently with the FEIR review process.

Comment 1-21

"The same level of impact analysis should be provided for the inadequate bridges which will be reconfigured. (the Pine Street Bridge in Grafton, and the Route 85 bridge in Southborough)."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The replacement of the Pine Street Bridge in Grafton is a Massachusetts Highway Department (MHD) project for which the MHD is responsible for any impact analysis and possible mitigation. The Route 85 railroad bridge in Southborough is part of this project. Potential impacts will be primarily during construction and are addressed in Sections 4.1 and 4.3.

Comment 1-22

"I note that the CAC and the MAPC have raised a variety of questions relating to bridge reconstruction and lowering of the rail line for double-stacked trains that should be addressed in the FEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The improved vertical clearance of 21 feet to provide for passage of Conrail's double stack containers is an EOTC program. Although not necessary for commuter rail operation, a feature of the seven mile track replacement between MP 33.2 and MP 40.3 will be the provision of the 21 foot clearance at the Shrewsbury Street Bridge in Grafton. Otherwise, no track lowering or bridge raising will be included in this project.

Comment 1-23

"There are also three grade crossings between Framingham and Worcester that will be affected by the additional train operations. Impacts associated with the increased rail service should be explained in the FEIR."

Response

See Section 5.3 of this FEIR #2, which addresses the grade crossings in Grafton (Parmenter Crossing) and in Ashland (Main and Cherry Streets).

Comment 1-24

"Will there be sufficient funding to mitigate the noise and vibration impacts to the desired levels? Have the barriers been found to be cost effective and therefore implementable? In areas that do not appear to meet the cost effective criterion, will noise attenuation measures be proposed for the buildings directly, or will other measures be proposed?"

Response

A noise barrier for 7 homes in Grafton has been found cost effective and funding is available to build the barrier if the property owners find it acceptable. Vibration mitigation has been determined to be unfeasible. No noise mitigation is proposed for isolated impacted residences.

Comment 1-25

Commenters have raised a concern that 31 trains will be running as late as 1:20 a.m. (p. 3-45). The FEIR report should be particularly sensitive to nighttime noise impacts and consider ways to control those late night and early morning operations."

Response

The noise descriptor used in the FEIR is particularly sensitive to late night and early morning operations. We use the day-night sound level (L_{dn}) which incorporates a 10 dB penalty for noise event occurring during the nighttime hours from 10 p.m. to 7 a.m. The 10 dB penalty means that each trains that runs in this time period is assumed to have the same noise effect as 10 trains running in the daytime hours.

Comment 1-26

"The FEIR should also respond to concerns expressed by the City of Boston with noise impacts in the Framingham-Boston corridor, and concerns that the noise standards used do not take into account background noise and cumulative impacts."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-27

"The DEIR includes an inventory of the expected train vibration impact (Table 7.3-4) to 41 residences. After reviewing the vibration mitigation options, the DEIR concludes that about 4,650 feet of ballast mats would be needed to reduce the impact entirely. The report concludes that it may not be cost effective to protect only a few houses, however. Moreover, mats may not be as effective in areas where the vibration is due to low frequency components. The FEIR should clarify the vibration mitigation plan based on further assessment of the areas of impact."

Response

(The following response presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Additional site measurements of vibration have been performed in Westborough, Ashland, and Grafton, to supplement previous data obtained in 1993. The revised

vibration impact analyses have been overlain on 1" = 200' scale maps of the rail corridor to determine more accurately potentially impacted residences. (See Section 4.3.)

Comment 1-28

"The DEIR has also recommended a complete architectural survey; however, the recommendations for the work on historical bridge structures remain unclear. This should be addressed in the FEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The survey of 26 bridges was performed and the appropriate forms submitted to the Massachusetts Historical Commission (MHC). The 15 railroad bridges, with the exception of the Route 85 bridge in Southborough, have been structurally rated and will not require any work under this project. The 11 highway bridges are under the control of the MHD.

Comment 1-29

"I concur with the suggestions of the Massachusetts Historical Commission (MHC) as to how and when to proceed with surveys and more advanced investigations, and what information should be provided in the FEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The permit application for an intensive archaeological survey was submitted to the MHC and approved in July 1995. The survey is along the railroad right-of-way in the seven mile stretch where excavation of undisturbed ground is anticipated for the installation of a replacement second track. The results of the survey indicate areas of possible intact archaeological sites.

(Due to severe weather conditions, a Memorandum of Agreement between the MBTA and the MHC is in process regarding the completion of all historic and archaeological requirements)

Comment 1-30

"The FEIR should provide more detailed information about the required culvert repair work and any new drainage outlets which will result in wetlands impacts."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Culvert repair and new drainage outlets are described in Section 4.4 - Right-of-Way Drainage. In summary, three culverts have been proposed for repair or alteration and one new culvert is proposed.

Comment 1-31

"Commitments to the maintenance of the storm drainage system should also be made in the FEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The railroad is, and will continue to be, owned and operated by the Consolidated Railroad Corporation (Conrail). Maintenance of the railroad includes rail "trueing," tie replacement, ballast replacement, and cleaning of drainage systems.

Comment 1-32

"What specified measures are needed for the oil drip pans and separators, such as those described for the layover facility (p. 9-11)? Although the description of the systems appears to suggest that these may not be the typical oil separators, the degree of effectiveness has not been predicted."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The oil-water separator at the Worcester layover facility will be a stand-alone system separate from the storm drainage system. Oil drip plans will be sized to capture oils, grease or fuel from the locomotive which will be always parked at the west end of the layover track. The oil separator will be sized to handle a complete failure of a locomotive diesel tank with an alarm system for high oil level which can be pumped out for proper disposal. The equipment specified will meet all state and federal oil and grease limitations under the new Pollutant Discharge Elimination Systems Regulations for Storm Water Discharges.

Comment 1-33

"I note that comments like those submitted on behalf of the Town of Westborough cannot be easily summarized; as provided in the MEPA regulations, those comments nonetheless require a Response in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-34

The Draft Section 61 Finding in the FEIR should itemize the proposed mitigation measures by station location."

Response

Please see Section 6.12 and 7.12 of this FEIR #2 for detailed descriptions of mitigation commitments by the MBTA for various aspects of the project. These commitments will be further expanded in the next FEIR (#3) to address site specific issues in Westborough, Southborough, and Ashland.

Note that the Draft Section 61 Findings provided in this FEIR are organized both topically and by station.

Comment 1-35

"The CAC and several commenters have concerns that traffic will be diverted and impacts worsened if adjacent stations are not developed within the same time frame. This issue needs to be considered in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-36

"As requested in the comment from the Department of Food and Agriculture, mitigation off-sets for indirect farmland impacts should be considered in the FEIR."

Response

Mitigation for indirect farmland impacts will be discussed as part of the local review process (possibly within the Notice of Intent filings) of the station sites in each town.

Comment 1-37

"Bicycle and pedestrian accessibility to and from the proposed stations is an important issue; amenities such as sidewalks, bike paths, lockers, and good travel routes to the station need attention in the FEIR."

Response

Sidewalks will be provided to those stations where "walk trips" are projected. No provisions for bicycle lockers are proposed, however, each station will be equipped with conventional bike racks.

Comment 1-38

Re: Ashland Station - "The CAC comment raises important issues concerning platform alignments and parking availability that need further evaluation."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-39

Re: Ashland Station- "It appears that the south parking lot access at Route 135 will have a significant impact. The Town of Ashland has recommended widening for designated turn lanes and signalization for safety. This should be evaluated in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-40

Re: Ashland Station- "There are also concerns with the intersections in Ashland that are at levels of service (LOS) D/F. Mitigation measures for these locations should also be considered."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-41

Re: Millbury Station - "The CAC comment questions some traffic assumptions and results that should be reconsidered in the FEIR."

Response

Refer to CAC Comment # 2-72, 73, 74, and 75.

Comment 1-42

Re: Millbury Station - "...a drainage system maintenance plan and commitments to fulfill the requirements of the plan need to be clarified in the FEIR."

Response

See Draft Section 61 Findings for mitigation commitments in Millbury. Refer to Section 6.5 of the FEIR for discussion of the proposed drainage system maintenance (stormwater management) plan.

Comment 1-43

Re: Millbury Station - "Bicycling and pedestrian access options should be pursued, and a commenter notes that the Route 122 station location is preferable because it is accessible to pedestrians and by bicycle."

Response

The CTPS ridership analysis does not project any pedestrians at either Millbury Station location. The proposed access road will provide additional 4-ft. shoulders to accommodate bicyclists and the occasional pedestrian. Bike racks will be provided at the station.

Comment 1-44

Re: Southborough Station - Commenters indicate that the pedestrian overpass is aesthetically out of character with the neighborhood. As an alternative, reactivation of the existing underpass has been proposed. The compatibility of the station design in the rural business district needs to be shown in the FEIR."

Response

Please note that an alternative to a pedestrian overpass at the Southborough Station is being pursued actively. The Route 85 railroad bridge is now planned to accommodate a wide sidewalk on the east side which would be connected to the station platforms by ramps and stairs.

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-45

Re: Southborough Station - "Closure of the median on Route 9 at Woodland Road has been reported to be held up because of the EIR review for the commuter rail project."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-46

Re: Southborough Station - "... the CAC comment recommends that the proposed signal timing changes at Route 85/Southville Road be reviewed because this measure may not be sufficient to mitigate the traffic impacts."

Response

Please note that a revamped intersection, including a new signal system and exclusive turning lanes, is under study.

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-47

Re: Westborough Station - "Neighbors have raised concerns about noise impacts on homes and the neighborhood that deserve attention in the FEIR."

Response

The noise impacts of Westborough Station will be addressed in the FEIR #3, Westborough, Southborough, and Ashland Station.

The noise impact of Basic Service, with and without Westborough Station are addressed in Section 5.2 of FEIR #2.

Comment 1-48

Re: Westborough Station - "Traffic volumes on Milk to Maynard Streets should be higher than indicated in the DEIR, and volumes on Fisher Street appear to be to low also. The traffic assumptions have been questioned by the CAC, the Town of Westborough municipal agencies and the MBTA Advisory Committee. Background growth does not appear to have been fully accounted for in the study and commuter route distribution has been questioned."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-49

Re: Westborough Station - "Safety issues at the key intersections have not been addressed to the satisfaction of commenters. Streets such as Arch Street are narrow and rural in character. However, these local streets have been impacted to a great degree by the development on Route 9 near Otis Street. These traffic and safety concerns warrant thoughtful consideration in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-50

Re: Grafton Station - "The traffic analysis should reconsider station traffic to Green Street in Shrewsbury."

Response

The assignment of traffic to Grafton Station has been revised in the FEIR for Millbury and Grafton Stations. Now 5.5% of traffic from towns north of the Grafton Station is assumed to use Green Street. The current roadway condition is such that the road is not an attractive route for through traffic. Also see Response to Comment 23-1.

Comment 1-51

"The town has raised a concern that no impact assessment of the three stations in Wellesley has been provided in the DEIR. The town has specific safety concerns."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 1-52

"A comment has observed that the DEIR did not provide a study of the potential for a new station at Kenmore Square (Yawkey Way) and its connection to the urban ring."

Response

The focus of this project has been on extending commuter service to locations west of Framingham. Thus, a new station at Kenmore Square was not considered as part of this project, although future consideration by the MBTA is not precluded by this project.

Comment 1-53

"The City of Boston has pointed out that additional information is needed to address pedestrian and platform issues at South Station."

Response

Pedestrian traffic at South Station and Back Bay Station was addressed in the November 1994 DEIR (Section 19.1). Studies by the City of Boston for the South Station/Dewey Square pedestrian traffic activity have been in process for a number of years. The solution to poor levels of service at some area street corners and crosswalks is both difficult to determine and quite possibly difficult to implement as a long-term solution given the myriad of projects which can or will affect the area. In any case, patrons from the Worcester commuter trains will add to the peak period pedestrian activity, but are not expected to affect significantly the problem. The MBTA has been an active participate in the planning of solutions and has offered to develop a package of mitigation measures once the final solution is in focus. With regard to approach track configuration and operation, and the station platform tracks at South Station, the MBTA Operations Section has studied the matter and is satisfied that current railroad operations, plus the Worcester service, plus the proposed Old Colony service, plus any other planned south side service can coexist. Further information in this matter can be obtained from MBTA Operations.

Comment 1-54

"The Department of Planning and Development has raised the concern that the basic and full build service may cause significant scheduling disruptions on existing services. This may be particularly so at the three stations in Newton because this is a single track service."

Response

Basic service primarily extends the runs of existing Framingham trains to Worcester. The four new trains will not adversely impact the existing operations between Boston and Framingham. Full build (Expanded Service) service is not addressed as part of this project.

Comment Letter No. 2

Citizens Advisory Committee Comments on DEIR (11/9/94)

Comment 2-1

"CAC wants to be on record, that the now documented interrelationship among station sites requires that a minimum of Ashland, Southborough, and Westborough stations open simultaneously (i.e., no more than 90 to 120 days between station openings). FEIR should make a commitment to this schedule *or* provide full disclosure of their station schedule and do full analysis of traffic, noise, etc., impacts for any station brought on line before the others. The host community should retain the right of refusal to bear these impacts albeit temporary."

Response

The Notice of Project Change, dated 10/31/95, requested that FEIR #3 cover the Westborough, Southborough, and Ashland Stations. The MEPA Certificate, dated 1/10/96, approved the request. It is planned that the above three stations will open for commuter operations within the window of time cited in the CAC comment. In the meantime, this FEIR #2 addresses the impacts of the Millbury and Grafton Stations and the temporary effects of railroad operations at the proposed Westborough, Southborough, and Ashland sites. (See Sections 5.2, 5.3, and 8.0 of this FEIR #2).

Comment 2-2

"The Certificate permits MBTA to segment each station's FEIR. However, the CAC believes that the DEIR documented interrelationships of Ashland, Southborough, and Westborough clearly requires one FEIR covering these three communities. Due to this high degree of interdependence, we urge the Secretary to scope the upcoming FEIR accordingly."

Response

See the MEPA Certificate, dated January 10, 1996, in Appendix A.

Comment 2-3

Re: Assessment Issues - "The Secretary can decide whether to push this issue further in the FEIR. However, this action should not be interpreted as acquiescence on this issue. Several communities have clearly stated they need assessment assurances or they will not accept a station."

Response

DEIR certificate absolves FEIR from assessment resolution. See Appendix A.

Comment 2-4

"The CAC had difficulty in reviewing the MEPA draft because the normal process is to compare all alternatives to find the best, but it appears that this document only had to prove the project *not to be infeasible*. The FEIR should address what level of analysis is being used to determine the feasibility of the alternatives contained in this DEIR versus other alternative transportation solutions."

Response

See Response to Comment 1-8.

Comment 2-5

"CAC requests that CTPS review projections (this will likely require working with CMRPC and with specific planning departments to consider building permit trends for the most current 36 months for Holliston, Hopkinton, Southborough, Westborough, Marlborough, Hudson, Ashland, and Milford."

Response

The ridership analysis was performed using the CTPS Regional Demand Models. These models utilize demographic data provided by the Regional Planning Agencies and the MPO. For this study, the population and employment projections were obtained from the Central Massachusetts Regional Planning Agency. If we were to do a more focused subarea analysis, we would have contacted the local towns and cities and obtained data from their building permits, etc.

Comment 2-6

"MBTA should divert traffic to collectors as opposed to local streets."

Response

See DEIR Appendix - Volume I (Traffic Analyses) In all cases, assignment of station bound traffic is made to the appropriate higher class roadways. State highways, arterial roadways and collector streets are always used versus local streets. In close proximity to a station, travel on local streets may be necessary.

Comment 2-7

"No performance indicators were presented in the level of service summaries for each station in accordance with EOTC/MEPA guidelines. Presentation of the performance indicators in the FEIR will assist reviewers in determining impacts to traffic operations which do not result in a change in level of service."

Response

For those who deem it necessary to evaluate the delays at signalized intersections and the reserve capacities at non-signalized intersections, the information is contained in Appendix - Volume 1 of the DEIR for Millbury and Grafton and in Appendix - Volume 1 of this FEIR #2, for Framingham.

Comment 2-8

"The DEIR measures traffic impact in terms of LOS decreases only. CAC believes *intensity and duration* of impacts are both issues."

Response

The traffic analyses addressed both peak hour and peak generator hour for A.M. and P.M. volumes. In most cases, peak hour and peak generator hour do not coincide and in the

westerly communities the two conditions may not overlap at all. The analysis of two separate traffic conditions addresses both intensity and duration of possible effects.

Comment 2-9

"Install pedestrian gate system at grade preventing commuters from crossing tracks when train is approaching/departing."

Response

A system of train-actuated gates at stations, as an alternative to pedestrian overpasses, was discussed with Conrail. As owner of the line between Worcester and Framingham, Conrail will not allow pedestrians to cross at grade at new stations.

Comment 2-10

"CAC requests that the proponent reconcile its mitigation policy to acknowledge that "breaking it" (e.g., an existing service or system) relates to the length of time the proponent is causing diminished service as well as the degree to which the proponent is diminishing these services.

Response

The traffic mitigation policy is consistent with other projects for which Environmental Impact Reports are required under MEPA. Therefore, the MBTA does not agree that there is a need to revise it.

Comment 2-11

"The construction of the new access drives/driveways to the commuter parking lots at the rail stations should not create new intersection traffic problems. Thus the access drives on Route 122, Megunko Road and River Street need further study in the FEIR. A 1996 LOS D for a new intersection is not acceptable. New construction should be designed to a higher standard, C or better."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

In Millbury, the Route 20 station site has been selected.

Comment 2-12

"The work planned for this Extension should in no way preclude the electrification of this line. In fact, electrification should be a goal."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The proposed project does not eliminate the possibility of electrification of the line, although the freight usage, which could require a vertical clearance of 21 feet, would require a catenary system that would require a significant amount of track lowering or bridge raising to provide the desired freight clearance.

Comment 2-13

"The summary asserts that "Without great trouble" the MBTA could put more trains on the Worcester commuter rail line to help meet 1999 Clean Air Act standards. Where will these additional cars and engines come from? How 'quickly can they be deployed?' Is their cost included in the $34M price for rolling stock?"

Response

The summary, in response to a possible contingency action to meet the 1999 Clean Air Act deadline, cited the possibility of an expanded program requiring employers to reduce single-occupancy vehicle commuting. Assuming an increase in commuter rail ridership, the MBTA will be prepared to absorb the new riders in the short term and, although additional equipment and funds for higher operating costs could be required, the long term demands would be met on any or all of the eleven commuter lines with proper planning and funding.

Comment 2-14

"Since the 800-ft. raised platforms are no longer required, the need for straight track station siting would seem to be greatly diminished. Could this allow for reconsideration of previously rejected sites?"

Response

The elimination of straight track as a station siting requirement will not, in and of itself, provide a reconsideration of previously rejected sites. Various other site selection criteria and/or projected impacts do not favor previously considered station sites.

Comment 2-15

"The mini-high platforms leave a gap between the platform and the train. Is this gap variable? What is the range of its size? Can a small child's foot get caught in it, or a high heel?"

Response

A gap of 5" to 7" is standard to allow for safe operation of passenger and freight trains. The gap can vary if the platform is on a curve. No doubt care is necessary and the need to use bridge plates is not anticipated, but the bridge plates will be available.

Comment 2-16

"The MBTA assessment formula splits all costs of overhead between express and local service. For costs that are not directly attributable to one or the other, the division is based on total express services costs vs. total local costs. In other words, as the express side of the ledger becomes fuller due to expansion, express service becomes more expensive the assessment formula."

Response

Refer to text which quotes DEIR certificate regarding no assessment discussion needed in FEIR.

Comment 2-17

"Are the Grafton sites privately or publicly owned? If they are privately owned, are the sites in the other towns publicly owned? This section of the DEIR should be more explicit and clarify this point since many readers may think their stations could ultimately become privately owned?"

Response

At the Grafton Station, the land is formerly the property of the Grafton State Hospital. Owned by the Commonwealth and administered by the DCPO, the property has been transferred to MBTA ownership. All other station sites -- in Millbury, Westborough, Southborough, and Ashland -- will be fee acquisitions from private owners and then will remain under MBTA ownership.

Comment 2-18

"CAC understands that the CTPS can model the 'cold start' factor into its air quality standards. Did the model for determining air quality benefit contain a factor which offsets the 'cold starts'?"

Response

The air quality accounts for "cold starts" through use of the operating mode fractions provided in EPA's Mobile 5a, which specifies the percentage of VMT completed in the cold start period. However, no special or additional factoring procedures were used to account for the difference between commuter trips to Boston and trips to commuter rail stations.

Comment 2-19

"The statement that 'The (Westborough MBTA Advisory) Committee expressed preference for the Smith Valve Parkway site' needs to be clarified. The Westborough MBTA Advisory Committee is charged to advise the Westborough Board of Selectmen, not the MBTA, and did not make the ultimate decision on preferred station location. The Westborough Board of Selectmen did not approve site selection at Smith Valve Parkway and has restated its position in support of a regional station somewhere in the vicinity of Interstate 495 and the Mass Pike."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-20

Re: Interim Service vs. Basic Service - "How many would be additional trains?"

Response

Interim Service, instituted in September 1994, runs three (3) round trip trains between Worcester and Boston. Basic Service will increase the number to ten (10) round trips. For a further explanation of the service, including trains which are an extension of the Framingham Service, see Section 4.0 of this FEIR #2.

Comment 2-21

"Please correct table 1.3-3 since there are no spaces at the Newtonville stop."

Response

This correction was made in the DEIR which was circulated.

Comment 2-22

"What is the Worcester Regional Transit Authority (WRTA) role in this project? Is WRTA contributing funding since Worcester, Millbury, Grafton, Westborough, Southborough (five of the six communities on rail extension) fall into this district?"

Response

WRTA is not an active participant in funding or constructing this project. They are invovled in the redevelopment of Worcester Union Station as an adjacent but separate project.

Comment 2-23

"The CAC believes it is inadequate for the DEIR to say that private bus ridership figures are not available because they are not public information."

Response

The MBTA's experience, in developing the DEIR and since, has been that companies to which it does not give subsidies do not willingly provide ridership figures.

Comment 2-24

"The DEIR does not indicate how many bridges and underpasses east of Framingham have to be rebuilt. If Framingham is as far east as the double stacked cars will be able to go, how does that make the Port of Boston intermodal? Why are we analyzing the cost of double stacking and raising bridges west of Framingham if this DEIR states that the line will only be double stack to Boston? Is not the goal to double stack rail lines to Worcester?"

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The DEIR addressed the double stack container clearance issue only to identify it as a project with some impact on the Worcester Commuter Rail Project. The double stack project is under the direction of EOTC and will be implemented and funded separately from the MBTA project.

Conrail has identified to EOTC the bridges requiring clearance improvements. Within the area where the MBTA will be restoring the second track, there are four bridges at issue. Three of these locations will be handled by MHD. At the fourth, Shrewsbury Street, the MBTA will provide the 21-foot clearance as incidental to the installation of the second track, track realignments and drainage work in the area. The MBTA will coordinate with EOTC on this clearance project to minimize future impacts to their commuter service from clearance construction once Basic Service begins.

Comment 2-25

"We need more than the data provided to understand why this is the service area, especially since MBTA estimates the patrons for Worcester Extension will be drawn from six miles or fewer from the rail line and not from much farther than ten miles away."

Response

The development of market area is one of the most important steps of the demand forecasting processes. Several factors were considered in defining the service area. The maximum distance people are willing to walk and drive to a station, the local roadway access, the in-vehicle travel time on the train, and other available travel options are some of them. The geographic distribution of existing commuter rail passengers and their access characteristics were obtained from several commuter rail passenger surveys conducted in the past. We used all this information in defining the service area.

Comment 2-26

"CAC requests that the proponent clarify whether ridership has been double-counted for this project -- based upon the MBTA Forge Park project."

Response

Though Milford was included in the services area, we assigned trips only from the northern portion of Milford to the Worcester line. Therefore, we did not double count trips.

Comment 2-27

"Same comments as I-32 above regarding inconsistency with bridge raising/track lowering is discussed all along route to Worcester. Why does DEIR describe service only as far east as Framingham?"

Response

The Worcester Commuter Rail Extension does not proposed to perform any clearance related work east of Framingham. In fact, the only incidental clearance related work will be at Shrewsbury Street in Grafton. See Response to Comment 2-24.

Comment 2-28

"Since it is proposed to defray the cost of this project with state funding, much more work will be needed in the FEIR to show how these stations will be multi-modal and in particular, bike friendly."

Response

In general, access to all stations will accommodate pedestrians and bicyclists. Bike racks are proposed at the stations.

Comment 2-29

"The CAC requests all roadway improvements create bike path lanes, e.g., Southborough Station to Hopkinton State Park. FEIR should detail what the MBTA plans are for improved bike access to their stations."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-30

"Who is paying for the reconstruction of the interim station?"

Response

The Interim Station was constructed with funds provided under the Legislative action which funded the Worcester Extension Project. Modifications which will be made upon completion of the Union Station project will be funded similarly. See Response to Comment 1-17.

Comment 2-31

"Site plans in DEIR fail to address bike usage on site or on train. The CAC requests bike lockers be considered at all stations.

Response

At present, the MBTA plans to install conventional bicycle racks at all proposed stations. In consideration of future documented demand for enhanced bicycle facilities, the MBTA will work with the communities and groups such as the Bicycle Coalition of Massachusetts to reevaluate this matter.

Comment 2-32

"The MBTA is proposing to lower tracks along the corridor to provide the capability for double-stack freight service in the corridor. The work is described as 'not necessary for the Worcester Extension, but would eliminate future service disturbances if EOTC moves ahead now with its double-stack plans.' EOTC's original double-stack plans were for the northern tier tracks used by the Fitchburg Commuter Rail service, and was designed to meet the re-use needs of Fort Devens. Conrail and others objected to this being included in the Transportation Bond Bill. The MBTA should not pay the cost of lowering tracks or raising bridges as part of this project. The DEIR states that this cost will be subsidized by the EOTC, however the financial section does not itemize this cost in a means that is identifiable."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

See Response to Comment 2-24. Note that the MBTA is not lowering track or raising bridges to obtain the desired freight clearance.

Comment 2-33

"'Approximate train schedules...' The proposed Basic Service schedule fails for a number of reasons:

1. Assuming four sets of equipment based in Worcester, trains 502A, 504A, 506, and 506A must be covered by trains based in Worcester because the first westbound (505) does not reach Worcester until 30 minutes after the departure of the fourth departure from Worcester.

2. Assuming that 505 turns for 510, the schedule needs adjustment because 510 cannot depart at the same time 505 is arriving. a minimum of 10 minutes must be allowed to detrain and entrain passengers, task the crews to change ends, contact the dispatcher and make the legally mandated brake test before departure of 510.

3. Following this logic, 509 must turn for 514. The equipment would sit idle in Worcester. Train 513 would turn for 518 and, again, would sit in Worcester for one hour.

4. Train 520A is scheduled for a 5:20 PM departure from Worcester. Unfortunately, there won't be a train set in Worcester until 5:35 PM, when 515A arrives.

5. Assuming the problem with 520A is a schedule glitch and 520A really will have equipment to run with, then the afternoon rush hour trains will start arriving. Train 519 and 521 will put their equipment away in Worcester because there is no schedule for them to return east.

6. Train 521A will turn for 526.Train 523 must turn for 530 using the proposed schedule with a layover of one hour fifty minutes. More than likely, 523 will put away in Worcester and the schedules of 527 and 530 will be corrected to allow 527 to turn for 530. Train 531 would be fourth set put away in Worcester at night.

7. Train 505 will have to turn for 512 after sitting in Worcester for an hour and ten minutes. In fact 507 will have arrived before 512 leaves and two sets will be sitting in Worcester. Train 507's equipment will have a two and one-half hour layover waiting for 514's schedule. This is problematic from both equipment and crew scheduling perspectives.

   Some may suggest shutting down the train set while it sits in Worcester. This is unlikely to occur because of the required time and tests that must be made after a set is restarted. Further, where does the crew wait during the layover? Moving the equipment to the layover facility would work, but by the time the necessary switching moves were made, it would almost be time to board passengers. These scheduling problems must be addressed in the FEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The approximate train schedules shown in Section 3.3 have been adjusted since the November 1994 DEIR to provide generally about a 15 minute layover for turn-around movements. Under Basic Service, a late train from Boston has been added to be the fourth layover train for morning service.

Comment 2-34

"Reverse commute - the schedules provide for it, and the chart clearly indicates that the towns have people who work in Worcester. However, no ridership or air quality credits are taken for all these outbound stops in the a.m. or inbound stops in the p.m. The FEIR must calculate Feasibility and Ridership for reverse commute. It must also recalculate cost and air quality benefits if in fact there is additional ridership."

Response

As indicated in the Feasibility Report, there would be some reverse commute trips on this line. However, we believe the magnitude of that would be very small compared to Boston bound trips. The 1995 Amtrak count data showed that there were 440 reverse commuter trips on the Providence line which is about three percent of daily boardings. While Providence is smaller than Worcester, its employment is somewhat more concentrated in downtown (in the vicinity of the station) than in Worcester. For this reason, we believe that reverse commuting on the Worcester line would not be a significant component of the overall ridership.

Comment 2-35

"Weekend Service - Will there be weekend service as originally promised, under Basic Service?"

Response

Although the indication of a "promise" for such service may have been discussed during the long project history, the proposed Basic Service schedule does not provide weekend service. The MBTA is currently preparing a weekend service schedule; implementation is likely in early 1997. Such a service should be similar to other MBTA commuter lines, offering about one-half weekday service. Also see Section 4.2 of this FEIR #2.

Comment 2-36

"What will the timing impacts be as each station is added to the schedule? Buses and cars take 60-70 minutes from Worcester now, and it gets respectively shorter for each town as you go east. Will the Basic Service still take only 60-70 minutes to get to Boston when the limited Interim Service presently takes 60-70 minutes."

Response

Obviously, addition of intermediate stops will increase travel times. Interim service schedules and speeds are affected somewhat by the single track operation between

Worcester and Westborough. Signal improvements and double tracking will improve operations.

Comment 2-37

"Have there been problems with the Interim Service evening trains? CAC members who investigated were told trains can be up to 24 minutes late in the evening. As verification, the buses that are nearly empty in the morning started to pick up evening ridership as commuters learned the ride home was not time competitive. The FEIR should address all of these scheduling issues."

Response

There have been some delays due to Conrail operational conflicts or breakdowns, primarily in the single track area west of MP33. The MTA is actively working with Conrail to remedy any conflicts and the addition of the second track will provide operational flexibility.

Comment 2-38

"If not included already, please include complete schedules for east of Framingham under the operation of Worcester Extension. The draft provided the CAC did not contain this data, and therefore, it was impossible to determine if new service has an impact on existing service (e.g., changes to station arrival time or deletion of an existing stop or stops)."

Response

Please refer to Section 4.2 of this FEIR for a presentation of approximate train schedules and reasons why full schedules, including departure times at all station stops, are not presented.

Comment 2-39

"The report claims that the Worcester Extension is an element of the state TIP. Since state TIP must be exactly the same as the regional TIP, this statement is inaccurate. The MBTA did not place its non-federal aid projects in the regional TIP. The TIP should not be used as one of the justifications for the project."

Response

No reference is made to the Worcester Commuter Rail Extension Project as an element of the state TIP in Section 3.6 of the DEIR. As stated in this section, "The MBTA plans to

use state bond funds to cover the project's capital costs." Because no federal aid will be used to fund project construction, the project is not included in either the regional or state Transportation Improvement Programs (TIP) which must identify all capital improvement projects programmed to receive federal funding.

However, the project is included in the Boston Metropolitan Planning Organization's Draft 1993 Transportation Plan and the project is also included in the federally enforceable State Implementation Plan (SIP) for air quality.

Comment 2-40

"The cost estimates in the DEIR do not necessarily cover off-site mitigation such as sidewalks, traffic signals, intersection/roadway widenings, and resurfacings. The FEIR should address what mitigation will be paid for with the $78 M Budget and what will require other funding and from whom."

Response

Although the specifics of individual station impacts and mitigation were not and could not be determined at the time the budget was established, the proposed station cost estimates include off-site roadway improvement costs associated with each station.

Comment 2-41

"The CAC is concerned about where the proposed $7 M subsidy will come from without additional funding resources which do not appear forthcoming."

Response

Operating funds for all MBTA lines comprise fare box revenues, MBTA assessments, and legislative supplements. Since the fare box recovery ratio for the Worcester Commuter Rail Extension is equal to or higher than other commuter rail lines, the MBTA does not anticipate funding difficulties.

Comment 2-42

"Before retiring from MBTA, Jerry Kennedy provided the CAC with cost figures for this line. Presently, the Framingham line has a great 64% cost recovery ratio. This drops to 42% with the extension, because Framingham to Worcester has only a 19% recovery ratio. The FEIR needs to break these numbers out better and explain if we are increasing or decreasing our cost recovery."

Response

The extension will reduce the cost recovery ratio. Typically, the farther from Boston a commuter rail segment, the lower its cost recovery. Please see Section 2.0 on the relationship between this project's costs and the MBTA's overall financial capacity.

Comment 2-43

"Since the possibility exists that the actual level of service will be closer to 'basic' than to 'extended,' there should be a separate revenue/cost analysis for each service level."

Response

The MBTA is no longer proposing expanded service. Please see Section 2.0 on the relationship between this project's costs and the MBTA's overall financial capacity.

Comment 2-44

"Please explain and detail the financing method and cost breakdowns in an amortized schedule (and correct associated tables)."

Response

Please see Section 2.0 on the relationship between this project's costs and the MBTA's overall financial capacity.

Comment 2-45

"CAC requests the proponent to provide a model for bus ridership, with the bus subsidized at the same rate as is proposed for the Worcester Commuter Rail extension."

Response

The MBTA is not proposing bus service as an alternative to this project, because CTPS projections have given it no reason to believe that any reasonably expectable level of bus service would ever draw the same ridership as train service. Accordingly, the MBTA must respectfully decline to develop the request information, which is, in any case, not information properly requested under MEPA.

Comment 2-46

Re: Capital and Maintenance Costs - "What year were these projections for?"

Response

The cost projections were for 1994.

Comment 2-47

"The CAC believes the DEP will allow a substitute project in the same corridor, and HOV express buses certainly qualify. The FEIR must address alternative selection more cogently and cite specific criteria."

Response

The MBTA has no current plans to ask EOTC to petition DEP to allow for a substitution for Worcester Rail because it does not believe any alternative can draw comparable ridership.

Comment 2-48

"It would be helpful for the CAC members if the FEIR had a section discussing the first month of Interim Service. We are particularly interested in the accuracy of the ridership projections for Interim Service versus actual counts."

Response

There are no interim service ridership projections against which to compare actual interim service ridership. Also see response to Comment 1-7.

Comments 2-49

"The DEIR does not address the potential impact on existing bus service in enough depth."

Response

In February 1995, the MBTA conducted a survey which showed only very small diversions of bus passengers to Interim Service trains at the Worcester stop. The MBTA and Peter Pan on March 30, 1995 entered into an agreement settling all Peter Pan's financial claims against the MBTA arising from these diversions.

Comment 2-50

"At a CAC meeting, we were told that there would need to be a 13c Agreement between the private carriers and the MBTA because public expenditures would negatively impact their business. The CAC had asked that these agreements be addressed in the DEIR. Since

they have not been, the FEIR should address their need, and if found to be necessary, how public funds will be committed in these agreements."

Response

The reference to a 13(c) agreement presumably refers to the section of Federal law providing for an agreement, subject to approval by the Secretary of Labor, concerning the bargaining rights of employees of private mass transportation acquired by a public agency. This is now codified at 49 USC 5333(b), formerly 49 USC 1609(c), and statutorily was section 13(c) of the Urban Mass Transportation Act of 1984. (Section 13(c) was originally section 10(c), but changed to 13(c) P.L. 89-562, §2(b)(1). See *Jackson Transit Authority v. Local Division 1285,* 457 US 16, Note 1.) A 13(c) agreement would only be in order under certain circumstances where Peter Pan or (any other private mass transportation company) has been acquired by the MBTA. See *Jackson Transit Authority,* id. at 18; *Amalgamated Transit Union, AFL-CIO v Brock,* 809 F.2d. 909 (D.C. Cir. 1987), pp. 911, 912; *United Transportation Union v. Brock,* 815 F.2d. 1562 (D.C. Cir. 1987), p. 1563. No such acquisition took place incident to the Worcester Rail project.

Comment 2-51

"These figures [bus ridership] should be better documented in the FEIR and the comparisons between bus and commuter rail analysis recalculated."

Response

There are no actual bus or train ridership data in the DEIR, only projections. The MBTA has no reason to believe that the ridership projections in the DEIR are invalid. Indeed, they compare quite favorably with new CTPS data developed for this FEIR. As pointed out under the Response to Comment 2-41, an MBTA survey of Worcester riders showed that only 16% were drawn from competing bus services.

Comment 2-52

"Wouldn't the increased speed on the Turnpike credit [air quality] also apply to an expanded (or even subsidized) bus service?"

Response

The hypothetical bus service employed in Section 5.1 of this FEIR #2, was presented for a basis of comparison to the Basic Service train operations with regards to air quality benefits. In fact, an expanded bus service would attract only a fraction of the riders projected for the trains.

Comment 2-53

"Assuming [Comment 52] is true, please include the reduction here."

Response

As noted in the Response to Comment 2-52, an expanded bus service is not realistic.

The emissions benefits associated with the change in Turnpike operating speeds does not apply directly to the bus alternative because there is not an equivalent change in the number of vehicles using the Turnpike. Although the number of automobiles diverted would remain the same under the given assumptions, the buses, which would operate on the Turnpike, would counteract some of the benefits created from the diverted automobiles, due to their contribution to added vehicular volume.

Comment 2-54

"Most members of the CAC disagree with the MBTA's statements concerning the likelihood of legislative reform of the MBTA district and its formula for assessments."

Response

The Secretary has agreed that MEPA review of the subject of assessments is concluded.

Comment 2-55

"A cap was placed on the reimbursement in 1983, so the refund to communities is getting steadily smaller. It is difficult to find this because there is no separate item on the cherry sheet."

Response

See Response to Comment 2-54.

Comment 2-56

"Should show the Fare Recovery Ratio."

Response

The DEIR indicated this ratio and it is repeated on Page 2-12, Millbury Station - Grafton Station - Railroad Operations FEIR.

Comment 2-57

"Please define 'equalized valuations for the prospective station site communities.'"

Response

The purport of the sentence from which the phrase is extracted is clear: no community would lose much property tax revenue were the MBTA to take a station site in that community.

Comment 2-58

"Safety mitigation at West Natick, Wellesley Hills and Wellesley Farms is not addressed anywhere in this document. Even prior to the introduction of interim service, Amtrack, Conrail, and several MBTA commuter rail trains passed through these stations at high speeds. All three stations require patrons to cross rail tracks to board or leave the train. Two of the three are also sited on curves, limiting visibility of approaching trains. The addition of eight to ten express trains per day will exacerbate this situation. Several improvements are suggested:

1. Better signage:
    - The current sign 'Be Aware of Fast Moving Trains' is not a sufficient warning.
    - Identifying which trains, by train number, board on the outbound track is almost useless; more relevant information would be time of departure, for example (5:33 p.m. to Boston).
2. Pedestrian crossovers at both Wellesley stops and West Natick could be incorporated onto nearby road bridges without major construction."

Response

These suggestions will be addressed by MBTA's Railroad Operations, Design and Construction Department through future construction projects.

Comment 2-59

"This chart [Figure 7.3-1] provides three different thresholds used to determine unacceptable levels of noise impacts. Which agency, if any, has the legal authority to superimpose their standard on the others? What is the purpose of this chart in the DEIR? Are you using EPA standards or are you using Federal Transportation Administration (FTA) standards as stated on p. 7-15? If you are using FTA criteria, why are they not shown in Figure 7.3-1?"

Response

Lacking any national noise standards, some governmental agencies have developed their own noise standards to be used on projects over which they have jurisdiction or funding authority. For example, the U.S. Department of Housing and Urban Development (HUD) developed noise standards to determine acceptability of sites for federally-funded housing. The U.S. Environmental Protection Agency (EPA) developed information on environmental noise levels that would be adequate to protect public health and welfare. For commuter rail projects, the MBTA uses the noise impact criteria from recently published guidelines of the Federal Transit Administration (FTA), along with a mitigation implementation policy established during previous projects (e.g., the Old Colony Railroad Project).

The purpose of Figure 7.3-1 in the DEIR is to provide a reference for people who may be unaccustomed with the L_{dn} noise descriptor used in the noise assessment. L_{dn} values are shown for typical environments with which a reader may be familiar. Also shown in the figure are noise levels which have been use as criteria by various federal agencies. The reason FTA criteria are not shown in the figure is that there is no single level associated with impact: FTA has adopted ambient-based criteria, which means that assessment of impact is based on the extent to which a project causes an increase in the existing noise level. The relevant figure illustrating noise levels associated with impact according to FTA is shown in Figure 1 of DEIR Appendix Volume I, Section 3.0.

Comment 2-60

"Federal agencies use different terms for what the CAC believes are the same intent. On the chart [Figure 7.3-1], HUD speaks of 'housing environment,' while EPA address 'ideal residential goal.' Are these interchangeable terms, or do they mean different things to the two different bureaucracies?"

Response

The various Federal noise policies and programs all share the common goal of protecting the public health and welfare with regard to noise. However, there are differences among agencies in purpose and application of a noise policy. Even though both HUD and EPA have established L_{dn}-based noise criteria for residential environments, the bases for each agency's acceptable noise levels are different. HUD has identified a practical range of noise environments which the agency finds acceptable and places special requirements on grantees during the siting of new federally-financed housing. HUD's definition of acceptable housing environment is based on typical conditions for noise environments under normal conditions in urban areas. EPA, in contrast, took a more scientific approach and developed information on levels of noise exposure to protect

public health and welfare with an adequate margin of safety. EPA has identified a maximum L_{dn} of 55 dBA to protect against outdoor activity interference and annoyance in residential areas, with the understanding that this level is not to be construed as a standard as it does not take into account cost or feasibility.

Comment 2-61

"The CAC does not agree that noise and vibration impact should only be calculated for residential uses. For example, Southborough still wants Fitzgerald's Store and Ipanema Restaurant assessed for nose and vibration impact both during construction and normal train operations."

Response

Noise and vibration impact criteria are based on guidance by the Federal Transit Administration (FTA). Under FTA guidelines, buildings used for commercial or industrial purposes are considered noise- or vibration-sensitive only if the business uses depend on quiet or low vibration conditions as an important part of operations, such as recording studios or microchip manufacturing facilities. Noise and vibration levels associated with activity interference within commercial buildings such as restaurants or stores have not been established by FTA.

FTA does have a noise-sensitive category for libraries, churches, schools and other "Institutional land uses with primarily daytime use." These are buildings where people focus on the spoken or written word and where there tends to be an environment where noise and vibration would interfere with those activities. Although neither a general store nor a restaurant fall into the described category, a very conservative approach to establishing criteria for commercial land use would be to consider them as such.

Comment 2-62

"Ashland has two senior citizen housing facilities adjacent to railcrossings. Grafton also has rail crossing traffic which will increase by 100% under this service. There are specific concerns with the analysis of noise/vibration and wish to see further clarification of the mitigation for these impacts."

Response

Noise impacts for these areas are discussed in Section 5.1 of this FEIR #2, Millbury and Grafton Stations and Railroad Operations.

Comment 2-63

"CAC requests the MBTA, by its generation of a nearly 100% increase in Ashland's and Grafton's rail crossings provide, in close coordination with Conrail, relief from locomotive horn blasts by installing a stationary horn (or other suitable technology) for rail crossing warnings."

Response

The issue of horn noise is addressed in Section 5.2 of this FEIR #2. As described in the text, stationary horns are, at present, an unproven technology.

Locomotive horn operation at highway grade crossings in Ashland and Grafton is not under the authority of the MBTA. Conrail, as the owner, dictates operating procedures and unilaterally requires horn operation for safety reasons. The MBTA must abide by Conrail's operating rules in order to operate on the Worcester line.

Comment 2-64

"On pg. 7-15, the DEIR states that FTA criteria determine impacts based on existing ambient noise levels. If you have a quiet area with ambient noise of 42 dBA, you can add as much as 10 dBA with no impact, but if it is noisy (i.e., 70 dBA), you can only add 1 dBA before you have an impact. Assuming this is all correct, then the MBTA should explain Table 7.3-1 Train Noise Impact Assessment at station locations."

Response

The discussion on p. 7-15 of DEIR applies to FTA's classification of "Impact." However, "Severe Impact", rather than "Impact", is the level used for considering mitigation for this project by the MBTA. Table 7.3-1 compares the Existing L_{dn} with the Future L_{dn} to obtain the projected increase at several measurement sites along the project corridor. These are described in detail in the DEIR Appendix Volume II, Section 3.0. The table also shows the allowable increase in noise before "Severe Impact" is reached according to the FTA. The column header "Impact?" should read "Severe Impact?". (See Table 5.2-1 in FEIR #2, Millbury and Grafton Stations and Railroad Operations.)

Comment 2-65

"The CAC shares Grafton's concern about the degree of noise impact they might incur. It was unclear how Table 7.3-1 says there are no impacts (albeit this is challenged in the above comment), and Table 7.3-2 then states six residences are impacted with Basic Service, and this jumps to 26 units with Expanded Service."

Response

Table 7.3-1 does not infer there are no impacts in all of Grafton, just at Measurement Site 4 located at Milepost 37.1.

Comment 2-66

"It is very difficult to believe that variable speed engines (which will not be in the higher throttle positions all the time in passenger service) generates louder sound levels than an engine which runs constantly at the maximum RPM possible. Interestingly, the dual engine locomotives are described on page 9-7, and it is clearly implied that such engines are quieter. Further, see Figure 9.3-1 on page 9-9 for what *appears* to be data in conflict with Figure 7-3.2.

These measurements may overstate the baseline noise dB levels, which may result in a smaller increase from this baseline as service increases. Grafton and Westborough measurement will be actually higher, since the semi-enclosed environment (given the density of buildings adjacent to the tracks) produces more reverberation of train sounds."

Response

Refer to DEIR Appendix Volume II, Section 3.0 for discussion of measurements of both Amtrak and MBTA trains to determine source levels. The MBTA trains measured in Natick, presumed to be with the older locomotives, were used for this assessment to represent the worst-case projections. Figure 9.3-1 shows sound spectra in octave bands to illustrate the difference in the characteristics of the sound for two different types of MBTA locomotives at idle. These data can not be directly compared with those in Figure 7.3-2 showing A-weighted maximum sound levels from moving locomotives.

Proximity of buildings of the type found in Grafton and Westborough results in slightly higher noise levels in the immediate vicinity of the track due to reflections and slightly lower noise levels on the other side of the buildings due to shielding. The environmental noise projections are based on an average condition.

Comment 2-67

"CAC requires additional information in the FEIR regarding noise impacts at the Layover Facility. The assumptions outlined in the first full paragraph on page 9-7 created confusion for many CAC members. It would seem impossible to start a locomotive up, run all of the required tests, move the equipment from the layover facility to the originating station, board passengers and depart in 45 minutes - at least not at the Worcester location because of the make-up of the operation. Trains do not go into

service from the layover facility. They move to their originating station and sit there idling while commuters board. The paragraph is misleading. FEIR must clarify this issue."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Start-up time plus travel to the station and boarding passengers will require one hour of time. The noise impact analysis has been significantly revised, as presented in Section 6.3. The issues raised in this comment have been addressed therein.

Comment 2-68

"Due to the scheduling inaccuracies indicated, the FEIR should consider the likelihood of as many as three or more engine sets idling simultaneously over longer periods. Peak generation of noise is actually greater than the DEIR indicates. We ask that re-projections of noise and emissions be recalculated.

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The noise impact analysis has been significantly revised, as presented in Section 6.3. The issues raised in this comment have been addressed therein.

Comment 2-69

"The argument has been made that only F40PH-C units will be sent to Worcester to mitigate the noise problem. However, the second day of Interim Service saw the introduction of the F40PH to Worcester. The third day saw the noise complaints on the front page of the Worcester paper, complete with pictures. This must be resolved in the FEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The MBTA installed electrical power at the temporary layover to mitigate the cited complaints. The permanent layover design includes the necessary electrical power to eliminate any overnight locomotive idling, as described in Section 6.3.

Comment 2-70

"CAC requests that noise mitigation take place or the facility will simply become the subject of unending complaints."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The required mitigation is part of the layover facility design. Provision of electrical plug-in power eliminates the need for overnight idling of the locomotive engines; therefore, noise impact effectively will be eliminated.

Comment 2-71

"The site of a regional station should be settled -- prior to the construction of local stations. This CAC, the Westborough Board of Selectmen, Southborough Board of Selectmen, Westborough/Northborough Area Chamber of Commerce and the Westborough Rail Advisory Committee all strongly support the undertaking of a thorough feasibility study of an I-495 regional station as proposed in the Transportation Bond Bill."

Response

See Response to Comment 1-9.

Comment 2-72

"It is surprising to see no traffic accessing the station [Millbury] from the Mass Pike. CAC would expect riders from Charlton to arrive on the Mass Pike as well as riders originating from communities west of Charlton, which may have been underestimated."

Response

In general, people do not like to use toll facilities for short trips.

Comment 2-73

"The majority of the intersections studied for this station [Millbury] are located in Worcester; however, there is no mention of contact with the Worcester Police Department regarding accident history."

Response

Contact with the Worcester Police Department led to the collection and review of Massachusetts Highway Department accident data for Route 20. The results of that review are in Section 6.2 of this FEIR.

Comment 2-74

"The Route 146/Mass Pike Interchange FEIS/FEIR shows a reduction in traffic volumes of approximately 20% on Route 20 west of Route 122 and 25% on Route 122 north of Interchange 11 with the proposed project; however, the traffic analysis does not reflect this condition."

Response

The Route 146 traffic projections are based on a completed highway system, which will not be operational within the 5 year analysis period employed in the Worcester Commuter Rail analyses.

Comment 2-75

"The 1994 No-Build traffic volumes presented in the Route 146/Mass Pike Interchange FEIS/FEIR on study roadways are significantly higher than those used for the 1996 traffic analysis. This should be explained."

Response

The ENF for the Route 146 project was filed in 1986, and the FEIS/FEIR was completed in 1994. The 1994 No-Build traffic volumes in that document are projections based on earlier traffic counts and growth factors. As noted in the Worcester DEIR, the traffic growth in the early 1990's is much less than occurred in the late 1980's. The difference is traffic volumes between the Route 146 report and the Worcester project is primarily the difference between projections based on old historical data and current traffic counts performed for the Worcester Commuter Rail studies.

Comment 2-76

"The CAC acknowledges there are specific questions pertaining to the traffic dispersion model (and how it was applied) at this Westborough site, specifically the traffic projections for Fisher and Maynard Streets. MBTA officials should work closely with Westborough to reconsider the assumptions in the traffic model and to rerun this model if necessary (e.g., conduct traffic counts at Maynard St./Rt. 135)."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-77

"The CAC has received an update from MBTA stating that Westborough and Southborough will now have sidewalks; however, the location of these is uncertain. The FEIR should state where these sidewalks will be located, the number of linear feet and any increases in site development budget."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-78

"Based upon recalibration of the traffic model (as described above), if traffic increases are shown to occur on Fisher and Maynard Streets, then air quality tests should be performed for residences and the schools along Fisher Street, due to vehicles using this area as a shortcut to reach Smith Valve Station."

Response

In the meantime, the Route 85 railroad bridge replacement design includes consideration of form liners to produce the effect of granite blocks for the abutment faces. This and other aspects of the design are being discussed with the MHC.

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-79

"The scope for the DEIR told the MBTA to address how the Southborough station should fit into the character of the rural village business district and how the granite bridge would be maintained as a gateway to Southborough. Neither issue is covered at all in this DEIR. Both need detailed discussion in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

In the meantime, the Route 85 railroad bridge replacement design includes consideration of 'form liners' to produce the effect of granite blocks for the abutment faces. This and other aspects of the design are being discussed with the MHC.

Comment 2-80

"CAC does not agree with the DEIR projection that 50% of the Upton train riders already use Southborough as their route to the Mass Pike. To save time, Upton uses I-495 to the 11a entrance to Mass Pike. Traffic impacts resulting directly from the station should be adjusted upward in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-81

"Based on its field trip to all proposed station sites, the CAC supports a recreation and landscaping project for Mill Pond, the Sudbury River, and Stone Arch Bridge in Southborough. However, the DEIR gives no more than a couple of sentences to this topic. The FEIR should offer more detail."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-82

"It has been agreed that sidewalks will be built in the proximity of Southborough Station as well as on the station site. This station has a high potential to serve Hopkinton State Park. Thus, the sidewalks exiting onto Route 85 at the new access driveway should provide crosswalks to get park users on the right side of Route 85. The crosswalks may also need pedestrian lights to assist safe crossings during peak hours."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-83

"CAC supports Southborough in strongly disagreeing with the supposition that traffic problems at the Route 85/Southville Road intersection can be remedied by merely retiming the existing traffic signal. Instead of debating this, CAC requests that the MBTA petition MHD District 3 *now* to retime these lights and then conduct additional, comparative analysis in the FEIR. Since the Route 85 bridge has been closed, traffic patterns have changed. MBTA should coordinate with Southborough how to address this issue in the recommended signal timing experiment."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

In the meantime, in conjunction with the Route 85 railroad bridge replacement design, it is likely that the Route 85/Southville Road intersection will be reconstructed with additional lanes and a new traffic signal system.

Comment 2-84

"DEIR shows 200 parking space capacity in Ashland, on the north side of tracks. Parking spillover is likely. Thus, the town would resort to restricted on-street parking between certain hours and also implement a "tag and tow" policy for controlling any parking lot spillover. The CAC requests a reevaluation of the proposed 200 parking spaces on the north side of the tracks."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-85

"The proposed Ashland West alternative is shown to have floodplain and some wetland. One potential solution is to break up the parcel into smaller *dry* parking lots (similar to West Natick) to avoid any wetland impact."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-86

"Traffic approach and dispersion for the Ashland West alternative is somewhat problematic, given current road and bridge configuration at Pleasant and High St.. How does the proponent plan to address this?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-87

"The proposed access road to either East or West alternative [Ashland] from Route 135 would require signalization/integration with existing Route 135 signals. This must be addressed in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-88

"CAC has a policy statement that sidewalks would be required at all rail stations to link them to pedestrians. Under the "west" alternative, DEIR does not indicate that Ashland needs them for access across the Cordaville Rd./Pleasant St.. bridge and as appropriate elsewhere."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-89

"We request MBTA consider breaking the proposed south lot [Ashland] into parcels (much like the West Natick MBTA lot."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 2-90

"Undoubtedly, the ACEC status of Cedar Swamp presents a problem for siting a regional station but positive, creative solutions may yet be found if really desired. The FEIR should continue to look at regional station option and not drop the topic as proposed in the DEIR."

Response

See Response to Comment 1-9.

Comment 2-91

"No specific ridership estimates were prepared for an alternative in which a regional station and all other intermediate stations except Westborough were constructed. The CAC had requested projection without Westborough and Southborough, at their meeting with the MBTA and its consultants on May 29, 1994. MBTA has told the CAC that it has the capabilities to develop this scenario. These omission should be included in the FEIR."

Response

This particular scenario has been analyzed recently. The results are included in Appendix D of this FEIR #2.

Comment 2-92

"Information regarding Fountainhead Plaza Project is erroneous and out of date. Permits have been obtained for construction of a WalMart at that location. This project is progressing, and it is reasonable to expect that it would be completed by late 1996. The WalMart project needs to be included in both the 2001 and 1996 'No Build' traffic projections."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment Letter No. 3

Massachusetts Senate/Senator Matthew J. Amorello (3/9/95)

Comment 3-1

"The Town of Millbury has requested that the Massachusetts Bay Transportation Authority explore access issues concerning the presently planned commuter rail station. Access from Route 20 in Millbury to the commuter rail station may be a viable option to meet this request. Congestion may be a result on local streets as commuters travel to the presently planned [Route 122] MBTA station in Millbury."

Response

After due consideration of the relative merits of the Route 122 and Route 20 Millbury Station alternatives, the MBTA has concluded that the Route 20 Station location will be advanced as the preferred option. Section 6.0 of this FEIR #2 covers the potential impacts and mitigation measures for the Millbury Route 20 Station.

Comment Letter No. 4

Massachusetts Senate/Senator Robert A. Durand (3/6/95)

Comment 4-1

"...I must reiterate my concern that a regional approach to an intermediate station be given more study and consideration."

Response

See Response to Comment 1-9.

Comment Letter No. 5

House of Representatives/Harriette L. Chandler (3/7/95)

Comment 5-1

"I would like to offer my full and unconditional support for the Union Station Intermodal Transportation Center Project and the Worcester Commuter Rail Extension Project. Both of these projects are vitally important to a brighter future for the city of Worcester."

Response

None required - The MBTA intends to be fully supportive of the Union Station project.

Comment Letter No. 6

Department of Food and Agriculture/Marcia Starkey (3/6/95)

Comment 6-1

"The Department requests that the proponent consult with the Department's Bureau of Markets during preparation of the Final EIR to explore cooperative efforts [re: preservation of farmland] of this kind."

Response

The MBTA has contacted the Massachusetts Department of Food and Agriculture (DFA), Bureau of Markets. DFA was informed of the project and the location of the stations in Grafton and Millbury, and the proposed station locations in the other three communities, to facilitate cooperation between the agencies in hopes of enhancing sales of produce from local farms in "urban edge" communities.

Comment Letter No. 7

MA Historical Commission/Brona Simon (3/9/95)

Comment 7-1

"The DEIR contains a draft reconnaissance archaeological report prepared by Timelines, Inc. that was reviewed by the MHC on June 30, 1994; the draft report does not appear to have been revised since our comments. Timelines, Inc. should submit two (2) copies of the revised, final report for our review and comment."

Response

Since issuance of the DEIR, an intensive archaeological survey was completed for the railroad right-of-way, in particular for the 7-mile segment from MP 33 to MP 40.3 where the project will replace the second track previously removed by Conrail. An intensive survey (delayed by weather) is in process for the Millbury Station site; the survey was completed for the Grafton Station site. Additional right-of-way survey to cover proposed fence installation will be completed shortly. All of the above incomplete archaeological work is addressed in a Memorandum of Agreement (MOA) which will assure that all of MHC's requirements are complied with fully.

Comment 7-2

"Specific areas recommended for intensive (locational) archaeological survey will be more clearly indicated when the revised report is completed. The DEIR proposes to include in the Final EIR summary results of the next stage of archaeological investigation: an intensive (locational) archaeological survey. MHC recommends that the intensive (locational) archaeological survey proceed as soon as possible. If potentially significant archaeological sites are located during the intensive survey, a site examination archaeological survey may be necessary to provide detailed information on the sites. MHC recommends that the FEIR incudes summary analyses (to protect sensitive site locational information) on ways to avoid, minimize, or mitigate adverse impacts to any significant archaeological sites in the impact area."

Response

See Response to Comment 7-1. The intensive archaeological surveys performed for the railroad right-of-way and for the Grafton Station site did not recover any archaeological resources which could prompt a site examination survey or the need to perform any site specific mitigation.

Comment 7-3

"If at all possible, summary results of these more advanced archaeological investigations should be included in the FEIR so that project planners have fuller benefit of this information, can provide more advanced analyses at the time the FEIR is completed, and thereby streamline the review. Otherwise, an alternative proposal for analysis and review (e.g., through a Notice of Project Change) should be agreed upon prior to finalizing project plans."

Response

During the time that has lapsed between the Track and Layover FEIR review and the filing of this FEIR, the MBTA has met with MHC several times in an effort to address responsibly the MHC concerns. It is believed that these meetings have served to identify the difficulty of the process for this major and complicated project. Recently, the MBTA and the MHC agreed to cover any incomplete aspects (See Memorandum of Agreement in Appendix H.)

Comment 7-4

"The MHC has received and is in the process of evaluating the over 170 inventory forms generated by the architectural survey of the project area. At the completion of the evaluation process, which is anticipated shortly, it is recommended that the MHC, the project consultants, and the project proponents will consult to discuss measures to avoid, minimize, or mitigate impacts to National Register or National Register-eligible properties. This procedure will enable a full discussion of the potential impacts and the mitigation measures to be included in the Final EIR."

Response

The MBTA has met recently with the MHC to present and discuss updated procedures for completion of the architectural survey, including identification of National Register and National Register - eligible properties. (Also see MOA in Appendix H.)

Comment Letter No. 8

DEP Central Region/Mary J. Richardson (3/9/95)

Comment 8-1

"However, the potential impacts from herbicide use along the tracks and bed and plans for snow removal or stockpiling within the recharge area of a municipal well or private well are important water supply issues and should be discussed in the Final Environmental Impact Report (FEIR)."

Response

The potential impacts from herbicide use along the tracks is discussed in Section 4.5 of the FEIR and identified in the Vegetation Management Plan (VMP) and the Yearly Operating Plan (YOP) included in Appendix E. Plans for snow removal will be addressed in the Notice of Intent filings with the towns for each intermediate station.

Comment 8-2

"The DEIR describes each station in detail and notes that sanitary facilities will not be provided at any of the facilities. If this decision is reversed in future plans, please be aware that a Massachusetts Division of Water Supply approved potable source of drinking water must be used."

Response

No sanitary facilities will be provided at any of the proposed commuter stations on the Worcester Extension. If future plans ever included sanitary facilities, water supply would be obtained from the local municipal water company.

Comment 8-3

"Plans for the Worcester layover facility include maintenance, storage, office space and sanitary facilities for all employees. Will this facility receive its potable water from the City of Worcester? Can the water system for the City of Worcester meet the demand (drinking, maintenance use, sanitation, fire protection) required for the facility? Have any agreements been made at this time? If connection to a public water system is planned, cross connection control devices must be implemented where necessary."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The layover facility will receive its potable water from the City of Worcester. The design drawings have been reviewed by the City and their comments have been incorporated into the Final Contract Documents, including installation of backflow preventors (cross connection control devices) in the proposed water system.

Comment 8-4

"Provide information in regard to the number of years and frequency with which herbicides have been applied along this segment of the rail. Which herbicides have been used in the past and which are being proposed for use in the future? Will herbicides be applied more frequently as a result of this project?"

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The frequency, type, and amount of herbicide application have a history that likely covers a time frame of about 150 years. Current and future vegetation management is and will be in accordance with Conrail's five-year Vegetation Management Plan (VMP), in accordance with DFA regulations and the Yearly Operational Plan (YOP) included in Appendix E. The proposed commuter rail project will not result in or require more frequent application of herbicides.

Comment 8-5

"Conrail currently manages herbicide use. It is stated in the DEIR that Conrail has an approved Vegetative Management Plan (VMP) from the Department of Food and Agriculture (DFA). Will Conrail assume the responsibility of vegetation management and herbicide application in the future?"

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Conrail owns and maintains the railroad between Worcester and Framingham and will continue to do so. All future vegetation management and herbicide application will be Conrail's responsibility.

Comment 8-6

"What are the potential impacts to public and private drinking water supply wells and public surface water supplies from the herbicide application? The DEIR states that only herbicides that are being used are those approved for use in 'sensitive areas.' Does this mean 'sensitive areas' as defined in 333 CMR 11.02, such as primary recharge areas of public water supplies?"

Response

The goals and objectives as well as the potential impacts associated with herbicide applications can be found in the VMP and YOP included as Appendix of this FEIR #2. "Sensitive Areas" is as defined in 333 CMR 11.02, a copy of which is included in the VMP.

Comment 8-7

"Are the communities/local boards of health/conservation commissions notified of the vegetative management plans for the upcoming year (333 CMR 11.06)? Are these groups given a means by which they can inform the proponent and/or Conrail of the location of new wells adjacent to the project that therefore would require adjustment of the herbicide markers? Are these groups notified of the approximate date application will take place (333 CMR 11.07)?"

Response

The Department of Food and Agriculture will publish a notice in the Environmental Monitor for public review and comment on the VMP and YOP. Applicants typically provide a copy of YOP and the Environmental Monitor notice to Boards of Health, Conservation Commissions and elected officials for the city or town in which the herbicide treatment is proposed. Refer also to the VMP and YOP included in Appendix E.

Comment 8-8

"What measures are taken by the proponent and/or Conrail to ensure that all the existing wells (private and public) and potable water sources under investigation for future use are identified and are accurately located on a map as part of the VMP? Is the most recent information obtained each year from the local board of health and/or the Department of Environmental Protection, Division of Water Supply?"

Response

The Department at Food and Agriculture allows a 45 day comment period on the YOP during which time location of all wells can be verified or corrected.

Comment 8-9

"Accordingly, all registered public water supply sources adjacent to the project need to be identified and labeled on the plans/maps in the DEIR and addressed appropriately. The Department should be contacted for the most recent list of registered public water supplies in those towns."

Response

The identification of public water supply sources is updated/verified by Conrail when Conrail prepares the Yearly Operating Plan (YOP).

Comment 8-10

"In the future, it is recommended that the Department be contacted on a regular basis prior to herbicide application to provide input as to the most current listing of registered public water supply sources. The Department's regional offices should also receive a copy of the Yearly Operational Plan (YOP) if application is planned for the respective region regulated by the Department."

Response

The Department of Food and Agriculture, the administrating body for the VMP and YOP, can coordinate with DEP and DEM in addition to local/municipal officials, See the VMP included in Appendix E of the FEIR.

Comment 8-11

"It is stated in the DEIR that there are 'no herbicide zones' and 'limited herbicide zones' along the rail. Describe what is meant by 'no herbicide zones' and 'limited herbicide zones.' Provide necessary details including the type of application (selective or broadcast) to be implemented in each type of zone."

Response

"No herbicide zones' are simply areas where herbicide application is prohibited. (e.g. within 400 feet of any public water supply well, within 100 feet of any surface public water supply, etc.) "Limited herbicide zones' are areas where herbicide application is

limited or has certain use restrictions. See the VMP and YOP in Appendix E for further information.

Comment 8-12

"Where are the herbicides stored and/or mixed? Any measures taken to prevent spills? How will herbicides be applied in the sensitive areas? How will unused chemicals be disposed of?"

Response

Herbicides are stored, mixed and applied in accordance with the manufacturers requirements as well as within the guidelines and regulations of the local, state, and federal authorities. See the VMP and YOP in Appendix E.

Comment 8-13

"It is not stated explicitly in the DEIR that spray markers are utilized as the method by which the perimeter of sensitive areas are delineated. It is assumed that this is the case because the presence of spray markers were used to determine the locations of inlet and outlet structures. This should be made clear in the Final EIR."

Response

Sensitive areas, no-spray areas, limited spray areas and non-sensitive areas are marked at their boundaries with color-coded signs and painted rail sections. Refer to the YOP in Appendix E for specific information.

Comment 8-14

"Field inspections of the track bed provided the location of the existing spray markers. The FEIR should include a map detailing the location of the markers and the zone types (no herbicide, limited herbicide, etc.) Where are the spray markers located and how are they mounted? Are the markers easily readable? Are markers replaced before they deteriorate from exposure to environmental elements? Are the markers reviewed prior to herbicide applications? The markers should be maintained so that they can be easily interpreted by the applicator."

Response

The responses to these issues is spelled out in Conrail's VMP and YOP. See Appendix E, Millbury Station - Grafton Station - Railroad Operations FEIR.

Comment 8-15

"Do future plans include a regular maintenance program for removal of vegetation from culverts and other structures along the tracks? Mechanical removal of vegetation rather than chemical removal should be utilized whenever feasible."

Response

Conrail, as the owner, has responsibility for maintenance of the right-of-way, independent of the MBTA passenger operations. Conrail has a regular maintenance program and a copy of their VMP is included in Appendix E of this FEIR #2.

Comment 8-16

"It is not clear in the DEIR whether the additional track will be used strictly for commuter use only. Will there be additional transportation of hazardous materials as compared to current operations as a result of the additional track? Consequently, will there be an increase in the potential for spills? Currently what are the provisions taken to prevent spillage of hazardous materials? Will any additional measures be taken? The Department strongly encourages the development of an emergency Response contingency plan which can be implemented quickly in the event of a spill."

Response

The additional track is necessary to operationally support the additional 14 trains for Basic Service. It's use is not limited to passenger train use. Conrail's traffic levels fluctuate independent of MBTA passenger service, and were not restricted by the single track prior to Basic Service. Both Conrail for freight and the MBTA for passenger service have emergency plans in place to handle spills.

Comment 8-17

"If there will be an increase in the freight operations as a result of the additional track, does the proponent expect there to be any increase in petroleum hydrocarbon (PHC) pollution associated with the increase in usage of the rail? The proponent states that a significant increase in concentrations of PHCs along the rail corridor is not expected by the additional activity of restoring commuter rail service."

Response

Freight service is not restricted today and will not increase simply from the second track installation. Our analysis of PHC concentrations was based on the increase of passenger trains in order to restore commuter rail service as covered by this project.

Comment 8-18

"Who will be responsible for parking lot sweeping programs and catch basin maintenance at each station? Is there any potential impact to water supply sources, public or private, from de-icing chemical and/or salt application to the parking lots or the stockpiling of contaminated snow? Will the proposed drainage systems adequately address contaminants from the parking lots such as salt, antifreeze, metals, oils, grease, etc.?"

Response

The MBTA is responsible for maintenance of their commuter rail stations. Certain maintenance functions such as plowing, sweeping, cleaning, etc. are often contracted out by the MBTA to private contractors or local public works departments.

The station designs will implement Best Management Practices (BMPs) to mitigate any potential impacts to resource areas. These will be addressed in the Notices of Intent to be filed in the individual towns for each rail station.

Comment 8-19

"It is stated in the DEIR that additional studies are needed to address possible hydrologic impacts to local private wells in the area as a result of the proposed site work and stormwater drainage system. It is important that these studies be completed in order to determine if replacement or connection to town water for these private wells is necessary."

Response

The additional studies referred to in the DEIR related to possible impacts associated with the Millbury Station - Route 122 Alternative, which is no longer under consideration. No private wells were identified north of the tracks where the Route 20 Alternative Millbury Station site will be located.

Comment 8-20

"The proposed site of the Grafton station is not within the Zone I or IWPA of any of Grafton's wells. The railbed is, however, approximately 0.32 miles from the IWPA for Grafton's East Street Wells No. 2 and No.3. Grafton's aquifer protection zoning overlay district does not include the proposed Grafton station site, but it does include almost one mile of railbed. The area covered by the railbed is likely to be included in the Zone II for these wells when it is delineated. Are herbicides being applied along this portion of the railbed?"

Response

Herbicides are applied only within those areas defined under the VMP and the YOP. Refer to Appendix E.

Comment 8-21

"An environmental site evaluation of the proposed Grafton station site indicates the presence of trace concentrations of acetone and Freon and levels of cadmium above expected background levels in the soil at the site. No pesticides or herbicides were detected above background levels in the composite surface soil sample. What are the background levels for pesticides and herbicides? Were the groundwater samples analyzed for pesticides and herbicides?"

Response

Page 13-36 of the DEIR states: "No pesticides, herbicides or Resource Conservation and Recovery Act 8 metals above background levels were detected in the composite surface soil sample collected of the site, with the exception of low levels of cadmium." This statement may have been misleading and could have been separated into two statements:

- No pesticides or herbicides were detected in the composite soil sample.
- No RCRA 8 metals above background levels were detected in the composite soil sample collected at the site, with the except of low levels of cadmium.

Comment 8-22

"The proposed station site and 0.2 miles of railbed are within the IWPA of Westborough's Otis Street well. Both have the potential to be within the Zone II of this well when it is delineated. Development of another well for Westborough next to the Otis Street Well is also under investigation. Are herbicides applied along the railbed in this area?"

Response

Herbicides are applied only within those areas defined under the VMP and the YOP. Refer to Appendix E.

Comment 8-23

"Approximately 0.67 miles of the railbed runs through the combined Zone II for Westborough's Andrews Street Wells No. 1 and No. 2 and Wilkinson Well. The railbed is also 0.35 miles from the IWPA of Westborough's Hopkinton Road Well and Morse Street Well (the area is also known as Cedar Swamp). It is likely that the railbed will be

within the Zone II for the Hopkinton Road and Morse Street wells when it is delineated. Are herbicides applied in these areas?"

Response

Herbicides are applied only within those areas defined under the VMP and the YOP. Refer to Appendix E.

Comment 8-24

"It is stated in the DEIR on page 14-31 that the station site does lie within the Zone B contributing watershed area of the Andrews and Wilkinson wells as depicted in Figure 14.4-1. Two types of aquifer and direct recharge areas, A-1 and A-2, are also depicted on Figure 14.4-1 (attached). However, none of these terms were defined in the DEIR and they do not match current water supply definitions. Apparently, the source of this information is from the Westborough Aquifer and Watershed Protection District's map completed by SEA Consultants in 1986. If this information is to be included in the Final EIR, these terms need to be defined, however, it would be more appropriate to use recent water supply terminology, especially since these wells have an approved Zone II."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 8-25

"It is stated in the DEIR that the quality or quantity of the recharged groundwater is not expected to change as result of the station site. A more complete explanation should be provided. The quality and perhaps the quantity will be affected if the site is within the Zone B contributing watershed area. What precautions will be taken to prevent pollution from the parking lot (stockpiled snow, salt, oils, metals, etc.) from contaminating the groundwater? Are herbicides being applied to the trackbed in this area as well?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 8-26

"The railbed is approximately one half mile from Saddle Hill Country Club, a registered non-community public water system located in Hopkinton. The railbed and proposed

station site are 0.25 miles from Carbone's Restaurant, a registered non-community public water system in Hopkinton. Is the proponent aware of these public water systems?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 8-27

"The proposed station site is adjacent to an area of Hopkinton that is served by private wells. Benzene, toluene and acetone were detected in soil samples from the proposed station site, however, these have not been confirmed. Determine if there is a potential for impacts from the site work and stormwater drainage from the station site to these private wells. Could the homes served by these wells be connected to public water if necessary."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 9

Central Massachusetts Regional Planning/Carl Hallstrom (3/9/95)

Comment 9-1

"The comprehensive nature of the issues raised by the CAC reflect their in-depth involvement in the process. Their comments encompass any specific concerns staff might have with respect to the project."

Response

CAC comments, as well as those from others, have been thoughtfully considered. Responses are or will be provided in either the Track and Layover FEIR (FEIR #1), this FEIR #2, or the pending FEIR #3 for Stations in Westborough, Southborough, and Ashland.

Comment Letter No. 10

MA Restaurant Association (2/5/95)

Comment 10-1

"I have just become aware of the possibility for a feasibility study regarding a regional commuter station in the Westborough area near route 495 and the Massachusetts Turnpike. I am writing in support of such a study."

Response

See Response to Comment 1-9.

Comment Letter No. 11

Massachusetts Audubon Society (3/8/95)

Comment 11-1

"Proposed wetland impacts have been reduced significantly since publication of the Environmental Notification Form (ENF) in 1992. Most notably, the proposed location of the Grafton Station has been moved away from a previously proposed site that would have involved considerable wetland filling. The Final EIRs for the track improvements and individual stations should provide additional detail showing that all feasible attempts have been made to avoid and reduce impacts to wetland resource areas and buffer zones, and that impacts to wetland resource values have been fully mitigated."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

As described in Section 4.5 Wetlands, proposed work along the railroad right-of-way has been designed with an emphasis on avoiding and minimizing impacts to wetland resource areas. These efforts include, but are not limited to, installation of ballast retaining walls to be placed in areas where a widened railbed embankment is proposed adjacent to a wetland resource.

Comment 11-2

"The Society believes it is important to clarify, however, that the concern raised in our ENF comments regarding fencing as a barrier to wildlife movements and habitat utilization was not restricted to large mammals such as deer or moose, or to large scale herd movements, as discussed in the DEIR. Rather, Massachusetts Audubon was concerned about the fragmentation of habitat for numerous species that would occur through construction of miles of continuous fence. Fencing could divide portions of habitat used by many species , potentially affecting local populations of animals, for example through restrictions on essential seasonal movements or through isolation of individuals within populations for breeding purposes. Although some animals may be able to pass over, through, or under a chain link fence, not all species or individuals within a species will be able to do so."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Section 4.7 describes fencing along the railroad right-of-way. In general, the proposed installation of additional fencing has been minimized and is limited to those areas where the track is adjacent to residential areas, and fencing is required for safety and security purposes. Fencing in such developed areas may be less likely to affect wildlife movement.

Comment 11-3

"The Society requests that the MBTA carefully evaluate and weigh the public safety benefits and environmental impacts of future new fencing along all its lines throughout the Commonwealth.

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The MBTA currently installs fencing only as required for public safety and equipment security. Future fencing on any MBTA line will be considered accordingly.

Comment 11-4

"The DEIR contains a level of detail adequate to understand the project as a whole and alternatives that have been considered for siting of local rail stations between Worcester

and Framingham. The Final EIR(s) should provide additional, site-specific details regarding rare species impact avoidance; wetlands avoidance and mitigation; and stormwater management system design for the railbed improvements and each proposed new station."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The railbed improvements, as described in Sections 4.5 and 4.6, have been designed in an effort to minimize or avoid direct impacts to wetland and wildlife resources. Design of each new station also will focus on minimization of impacts and will provide proper mitigation on a site specific basis. These design and mitigation elements will be discussed in detail in the subsequent FEIR on Commuter Rail Stations and Railroad Operations.

Comment 11-5

"The Massachusetts Audubon Society supports the project in concept, provided impacts to sensitive biological and water resources along the project corridor are minimized and carefully managed. The DEIR is adequate, and documents how project impacts have been reduced in some significant ways (i.e. reduction of wetland impacts and fencing, provision for stormwater best management practices at stations). The Final EIR's for the railbed improvements, and Final EIRs for new stations should provide additional details regarding site-specific impacts and mitigation."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

As described is sections 4.4 through 4.7, the railbed improvements have been designed in an effort to minimize impacts to wetland resources and wildlife movements. The FEIR for new stations will provide additional detail of impact and proposed mitigation for each site specific area.

Comment Letter No. 12

Bicycle Coalition of MA/John Allen (1/22/95)

Comment 12-1

"We have already offered comments for MEPA reviews of proposed improvements at the Natick, Framingham, and Worcester stations. Our comments for the other stations are similar: that bicyclists should be able to access the station by road and/or bicycle path from every direction, and that secure bicycle parking should be available."

Response

This FEIR #2, which covers the Millbury and Grafton Stations, cites the inclusion of bicycle racks at the stations. Bicyclists will be able to access each station via existing public roads; bicycle paths are not proposed.

Comment 12-2

"We also encourage the MBTA to consider measures to increase the scope and convenience of its Bikes on the T program which permits bicycles to be transported on MBTA rail lines, including extension of the program to the Worcester line; use of rolling stock which can easily accommodate bicycles and other large baggage items (the current double decker cars with the fold-up seats at their ends are a good example); and more locations and times at which bicycle passes (and other special needs passes) may be purchased -- especially important as many Worcester line passengers may never travel into Boston where the pass office is presently located."

Response

The MBTA currently has a bicycle policy. The policy allows for off peak usage and a maximum six bicycles per train. The MBTA believes that transporting commuters comes first but additional space for bicycle facilities on the trains will be considered in the future.

The purchase of a bicycle pass for a five year interval is not a hardship.

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The purchase of a bicycle pass for a five year interval is not a hardship.

Comment Letter No. 13

Metropolitan Area Planning Council/David Soule (2/28/95)

Comment 13-1

"MAPC believes that the DEIR must address the MBTA's financial capability to maintain existing services along with funding service expansions. The financial capacity of the MBTA has direct impacts on air quality as fare increases and service reductions can be directly linked to both short and long term losses in ridership, increase in automobile travel and increases in air pollution. Therefore, the financial capacity of the MBTA is an environmental issue."

Response

Please see Section 2.0 on the relationship between this project and the MBTA's overall financial capacity.

Comment 13-2

"Operating costs are an environmental issue and should be made part of a modified scope. A project change and a change in scope is clearly justified. In 1992 when the ENF was filed, the state portion of the MBTA operating budget was not in the process of being reduced by 15%. As recently as the 1993/1994 review of the South Boston Piers FEIR, the MBTA financial capacity analysis was projecting increases in state subsidies, after only a one time cut of $16 million. This financial feasibility analysis was conducted for the Federal Transit Administration. These reductions in the operating budget, raises questions on the ability of the MBTA to open new services and continue to operate other services at existing levels."

Response

The MBTA must respectfully disagree that operating costs, as they bear on this project, are an environmental issue meriting rescoping, as they are not among the MBTA operating issues called out in the MEPA regulations. See 301 CMR 11.27(2)(b). Nonetheless, please see the discussion in Section 2.0 of overall MBTA financial capacity to proceed with the Worcester Rail project, other new projects, and existing operations.

The Secretary has stated that costs connected with mitigation are properly before MEPA. The MBTA agrees only to the limited extent that it may properly be asked, for mitigation determined under MEPA to be necessary, to commit under MEPA timely to meeting such

mitigation's costs, capital, or operating. How the MBTA meets those costs is, with all due respect to the commenter and the Secretary, not properly before MEPA.

Comment 13-3

"A complete financial plan for the MBTA is vital. Such a plan should consider the services offered, operating revenue and subsidies by mode, administrative costs and the location of the service/costs relative to the MBTA borders. With such a plan, the fare structure and state subsidies could be more effectively reviewed."

Response

Overall MBTA financing, save in certain fare increase matters, is outside MEPA's jurisdiction.

Comment 13-4

"The MBTA did develop an analysis of the change in local MBTA assessments for MBTA district communities that illustrates the impact of the service on its members. An expanded version of this analysis should have been included in the EIR to gauge impacts of rail assessments on communities in the corridor that are beyond the MBTA district."

Response

Further discussion or analysis of the assessment issues not required in accordance with the DEIR Certificate. See Appendix A.

Comment 13-5

"Could a subsidy for the existing bus services, coupled with the Turnpike's Park and Ride program provide a greater benefit to the region for a lower cost?"

Response

The MBTA believes that the preferred alternative will do the best job over time of ensuring that the largest ridership will have reliable transportation between Boston and the service area. It should be noted that according to CTPS, no bus alternative draws the ridership of the preferred alternative. It should also be noted that the Massachusetts Turnpike Authority's expanded park-and-ride efforts are seen to complement Worcester Rail in diverting Boston-bound automobile drivers to HOV modes.

Comment 13-6

"The Air Quality Analysis states that the CTPS ridership projections assumed all rail riders are from automobiles, none are from existing bus services (Appendix 6, page 2). In fact, the binary choice model used by CTPS (Appendix 2, Section 6) states that about 85% of all trips are from automobiles, with the remaining from private bus carriers (Appendix 2, Section 8 Highway Impacts)."

Response

As stated in Section 5.5 of the DEIR, no diversion of riders from existing bus services was assumed since emissions from auto trips to the bus stops were estimated to be equivalent to the same number of trips by riders to the commuter rail stations. There would be no air quality benefit from transferring bus riders to commuter rail and these ridership numbers were omitted.

Comment 13-7

"The CTPS travel model discussed in Appendix Volume II Section 2.0 suggests that the project will draw most of its auto trips from the Turnpike, while the air quality analysis suggests that only about 50% of the auto trips are turnpike users and that only one half of that number are peak hour commuters. The result is the CTPS analysis finds morning peak period turnpike reductions of 125 vehicles between Worcester and I-495, 555 vehicles between I-495 and Route 128, and 1,400 vehicles between Route 128 and Boston for 1996. The air quality analysis on the other hand suggests only a reduction of 445 vehicles on the turnpike during the same time period."

Response

The air quality analysis has been adjusted to reflect the same assumptions as the CTPS model. CTPS provided the following characteristics for its ridership estimates:

- Automobile diversion is assumed to consist of 85% of ridership estimates.
- 65% of all trips are assumed to account for diversion from the Massachusetts Turnpike.
- 54% of all trips are assumed to account for peak hour movements.
- Vehicle occupancy is assumed to be 1.2 person per vehicle.

Comment 13-8

"CTPS analysis provided both person trips and vehicle trip demands at all stations - this was in the form of identifying walk trips to stations, kiss and ride trips and the actual parking demand at each station. These figures appear to not be used in the air quality analysis which used basic adjustments for vehicle occupancy rates and developed separate kiss and ride figures."

Response

The air quality analysis did use the person trips and vehicle trip demands provided by the CTPS as the basis for the calculation of vehicular emissions.

The CTPS ridership forecasts provided person trip estimates from each town to each station. These trips were broken down into park and ride, kiss and ride, and walkers. A vehicle occupancy rate of 1.12 persons was used to calculate vehicle trips for the park and ride and kiss and ride trips.

Additional assumptions were made as follows: Kiss and ride accounted for two vehicle round trips from point of origin to the station and back; kiss and ride trips originated from within the town with the station; and the walk trips originated within the town with the station.

Comment 13-9

"The air quality analysis suggests that kiss and ride trips at particular stations will originate from the town in which the station is located (Appendix 6, Section 2). Following this logic, of the 22 residents of Westborough using commuter rail at the Westborough station, 17 will be kiss and ride trips. This is an extremely high ratio. More likely, given the location of the Westborough station which is clearly more convenient to non-Westborough residents, residents of communities neighboring Westborough will provide a proportionate share of kiss and ride trips. Given that 90% of the riders at this station will be non-residents (Appendix 2, Table 9), one would expect that most of the kiss and ride patronage will be non-residents. This affects trip length for kiss and ride trips, overall VMT and emission of pollution. The traffic model used to develop the demand analysis for the rail extension should have been relied upon for developing VMT reductions and speed changes for the air quality analysis."

Response

It is logical to assume that kiss and ride trips will originate from a closer proximity to the station, given the "empty" return trip, than the park and ride trips. The CTPS model does not provide a breakdown of trip type at the point of origin.

Based on the latest CTPS ridership estimates (January 1996) the town of Westborough provides more than 18 percent of the total demand boarding at the Westborough Station in both the 1996 and 2001 forecast periods. Assuming that all kiss and ride trips originate from within Westborough, they would make up less than 50 percent of the Westborough demand.

Comment 13-10

"Since the expanded service analysis does not anticipate increased ridership in the DEIR, the numbers related to the scenario should be disregarded. Most gravity models would identify an increase in ridership from more frequent service, even if the number is quite small. Based upon the assumptions in the DEIR, to implement the expanded train service the state would need to find an air quality off-set for the emissions."

Response

The MBTA is no longer proposing what the DEIR called expanded service. See the proposed schedule in Section 4.2 of this FEIR #2.

Comment 13-11

"A third air quality concern deals with the ridership projections themselves. The discussion of ridership projections suggests that the bus ridership levels may not have been based upon a gravity model, but simply assigned the train riders to buses for comparison. This level of analysis does not provide an accurate comparison of the two services. MBTA personnel noted at the October 1994 CAC Meeting that they believe that buses will not be able to attract or accommodate the same level of ridership as the trains. The demand modeling needs to be properly conducted for all modes in the analysis to accurately gauge ridership levels and air quality benefits."

Response

The bus ridership estimates calculated by the CTPS models were indeed based on the comparative travel costs and travel times of competing transit modes (such as bus and rail) for any selected origin to destination. We did not simply assign train riders to the bus mode as MAPC implies. The attributes of the rail network as well as the bus network were used simultaneously in each analysis run.

Comment 13-12

"We believe that the estimations of the existing ridership on area bus services to be inadequate. There are contradictions between the recently completed Mass. Turnpike

Study and this draft EIR. We recommend that the MBTA could survey existing transit boardings at park and ride facilities in the study area to determine ridership levels."

Response

See Response to Comment 1-11.

Comment 13-13

"The analysis is unclear on the origins of commuter trips using this service. One would expect that this service will draw residents currently using MBTA services such as the Green Line at Riverside or commuter rail from Framingham to switch modes or stations. It is unclear in the EIR how these changes have been accounted for. In Appendix 6, one suggestion is that only Peter Pan riders will be drawn to this service. This would seem to be inaccurate given the demand suggested for Ashland and Southborough stations. How may of the users of these two stations currently use Framingham Commuter Rail Service? How many currently use the Green Line? Will the diversion of trips from Riverside reduce MBTA revenues for Express Bus, Green Line, or parking usage?"

Response

We believe that the effect of this service on other MBTA services would be minimal. Regional transit assignment results indicate minor changes on Green Line inbound ridership levels. Our ridership analysis in the DEIR step indicated that the Framingham station would experience a significant loss of ridership when other stations on the extension are built. The tables included in the DEIR however, did not show the projected ridership levels at Framingham Station. The revised ridership projections in this FEIR #2 now include the Framingham riders (See Appendix D).

Comment 13-14

"The census reveals 441 riders on commuter rail from the MAPC communities in the study area. How do the 205 commuter rail riders in 1990 correspond to the estimated 377 riders in 1996 from Ashland Station? Were all of the 1990 commuter rail riders using Framingham Station? Were these existing rail riders estimated to be automobile trips in the air quality analysis? How does the financial analysis for the Worcester Extension change if approximately one-fifth of the ridership are currently users of commuter rail?"

Response

The 1993 commuter rail survey indicates that about 120 passengers from Ashland, 25 from Southborough, 65 from Hopkinton and 65 from Holliston used the Framingham Station. With the Ashland Station in place, the model allocated all this ridership to the

Ashland Station. We would like to emphasize here that the trips allocated by the model include non-work trips also. The growth in trips from 1990 to 1996 plus the increase in mode share due to the availability of a commuter rail station in Ashland resulted in a total ridership of 375 from Ashland (work and non-work trips). This represents a 35 percent increase from 1990 which is reasonable considering that the 1996 trips include non-work trips also.

Comment 13-15

"It is imperative, where the state is about to expend $60 million to design and Engineer the rail link, that all new services provide full accessibility for the disabled. Only by providing this level of access will proper compliance with the ADA be met."

Response

The MBTA has every intention of providing access for the handicapped. The MBTA has requested a variance from provisions of the Massachusetts Architectural Access Board to allow for 45-foot long raised "mini-high" platforms rather than raised platforms of 800 feet. This shorter raised platform will allow for the handicapped access while allowing for the continued primary use of the rail line for high-wide load freight operations by Conrail, the owner of the rail right-of-way.

Comment 13-16

"The MBTA should not pay the cost of lowering tracks or raising bridges as a part of this [double-stack freight] project. The DEIR states that this cost will be subsidized by EOTC, but the financial section does not itemize this cost in a means that is identifiable."

Response

At present, because it is more economical to do the work now while the project's double-tracking is underway, the MBTA s Worcester Rail project will pay for one section of track-lowering in the Grafton area. Remaining bridge-raising and track-lowering costs are not related to this project.

Comment 13-17

"The station locations have been chosen in part to avoid impacting residential concentrations or in town centers. This results in reducing the pedestrian accessibility to the stations. Consequently, the traffic impact analysis suggests only the Ashland and Worcester Stations meet the needs of pedestrians. In the 1970s, the Interstate highway system was built with the goal of avoiding where people were. This led to new areas of

sprawl development. Stations need to be near town centers to reinforce existing concentrations of population and employment and to promote pedestrian access."

Response

Stations were considered in or near town centers where appropriate, either in the form of a new station or at the site of a former station. The lack of adequate parking and/or adverse traffic impacts were not acceptable.

Comment 13-18

"MAPC recommends that the EIR analyze the impacts of station locations as they relate to promoting sprawl type development. We do not believe that the current EIR adequately addresses the growth impacts of the proposed rail facility, especially as they relate to automobile access. In particular, any proposed mega-station needs to include a land use change study. We believe that the potential I-495 station, given the possible impacts, must be studied as part of the EIR process and not as part of separate study."

Response

See Response to Comment 1-9 regarding the Regional Station Study and Report. With respect to promoting sprawl type development, the project's chief effects will be on how people in the service area get to work, and thus only minimally on land use per se. Because the project will make it easier for some people to get to work in Boston, it may marginally stimulate housing demand, since some service area housing could appeal to those who could not afford housing closer to Boston; this demand would complement existing demand for housing among those who work in the areas along and between Route 128 and I-495. Nonetheless, how this marginal demand is translated into actual new housing is almost completely under the control of local zoning, wetlands and other regulations affecting land use. Similarly, there may be a marginal stimulus around commercial development, but this too would be a matter very much under local control.

Comment Letter No. 14

METROWEST/Charles E. Gaffney (3/7/95)

Comment 14-1

" ... Metrowest Growth Management Committee's request to Secretary Coxe to revisit the structure and membership of the CAC, and to instruct the MBTA to put more effort into making this citizen participation vehicle meaningful and inclusive."

Response

The Secretary's Certificate (January 10, 1996) on the October 31, 1995 Notice of Project Change includes a new CAC membership list (See Appendix A). It is the MBTA's position that, in the past, ongoing and in the future citizen participation, especially that of the CAC, plays a meaningful role in the commuter rail process.

Comment 14-2

"It has become more and more evident as this project review evolves that there are two communities that will experience very direct impacts from this project which were left off the CAC. They are Framingham and Hopkinton. Often they come and observe CAC meetings but cannot vote and only add comments after members have had a chance to speak."

Response

A restructured CAC now includes representatives from Hopkinton and Framingham. See Response to Comment 14-1.

Comment 14-3

"The FEIR should conduct further study of a regional station solution. The ridership projections should not be based on local stations already in place with their own pre-existing ridership, but rather should be based on the regional station being the only station for Southborough and Westborough. Some ridership should also be drawn off the MA Turnpike and off I-495."

Response

See Response to Comment 1-9. Also see revised CTPS ridership projections in Appendix D of this FEIR.

Comment 14-4

"Are these [ridership] projections done by CTPS based on metro-Boston population projections (i.e., negative growth by 2010) or are they based on METROWEST, SWAP and CMRPC growth projections for the catchment area (very high growth)? Town by town data should be used as opposed to region wide calculations that are skewed by cities losing population."

Response

In 1989, as a part of the Long Range Transportation Plan, CTPS developed a Commuter Source Region consisting of 339 cities and towns (242 cities and towns in eastern Massachusetts, 55 in southern New Hampshire, 30 in Rhode Island, 8 in northern Connecticut and 4 in southern Maine. For this region, the future year trips were developed from 1980 Census data and socioeconomic information for the cities and towns (obtained from the MPO's) and work trip attraction control totals for the downtown Boston area. Once the 1990 census data became available, the forecast year trips developed earlier were updated and modified to reflect the changes seen in the 1990 census data. The CTPS regional models were developed and calibrated based on demographic information obtained from the MPO's. Therefore, to maintain consistency, we did not use town by town data in this analysis.

Comment 14-5

"How can towns have confidence in the accuracy of these ridership projections, if as reported in the newspapers the Worcester station has already reached MBTA 1996 ridership figures? We are glad the rail line is successful, but if this degree of underestimating spills into the towns, then their roads will not handle the traffic and the parking lots will be overflowing."

Response

See Response to Comment 1-7.

Comment 14-6

"The FEIR must address what will happen in downtown Framingham through 2010 with the expansion of express service. Downtown Framingham may experience the heaviest impacts from this extension, but no mitigation is being offered to the town. The FEIR must remedy this omission."

Response

See Section 8.0 of this FEIR #2.

Comment 14-7

"In all likelihood projections should not be done on the basis of town-wide ridership but rather on the basis of census tracts or transportation planning block groups already established. This avoids double counting ridership, e.g., Milford allocated to this line and the Franklin station."

Response

See Response to Comment 2-5 and 2-26.

Comment 14-8

"Some reverse ridership, albeit small, is inevitable and should be credited for air quality and cost/benefit calculations. Charts are provided in the DEIR that show that 1,834 people already commute east to west from communities that might access this extension, but no estimate of how many of these people would use this train is given."

Response

See Response to Comment 2-34.

Comment 14-9

"What will the MBTA do to improve modal choice? If they do offer advertising and marketing programs (as they should), then the projections based on a status quo model underestimates ridership."

Response

The MBTA has improved modal choice by implementing service to Worcester in 1994. As to market share, which is believed to be the thrust of the comment, the MBTA will ensure that the initiation at Basic Service, with stops in Millbury and Grafton, is well publicized. Local news media have provided coverage of the project, and likely will continue to do so.

Comment 14-10

"The MBTA still refuses to do more than cite existing law. Secretary Coxe, you should direct the MBTA to provide some estimates to municipalities concerning their assessments, if current law were to change."

Response

Further discussion and analysis of the assessment issue is not required in accordance with the DEIR certificate. See Appendix A.

Comment 14-11

"Presently there is a Joint Legislative Study Committee researching how to change MBTA assessment practices to make them more equitable. Thus the MBTA's contention that the

assessment formula has not changed in nearly 20 years and will not in the foreseeable future appears misleading. This committee is scheduled to report this spring."

Response

The deadline for the legislative report was extended at least to December 1995. The MBTA still maintains that the entire assessment matter is in the hands of the Legislature and that the MBTA has no input nor any say in the matter.

Comment 14-12

"Intersection and sidewalk improvements alluded to in the DEIR do not appear to have any funding set aside for them. The FEIR should give a station-by-station accounting of improvements planned, the cost, the source of that funding and the timing of the availability of that funding, in order to assure that all mitigation will be implemented when each stations opens."

Response

See Response to Comment 2-40.

Comment 14-13

"The DEIR does not provide any information on how these stations will be multi-modal, especially regarding pedestrians and bicycles. As roadway mitigation is being done to improve auto access to the stations, these roads should also be improved with sidewalks and bike lanes."

Response

Where appropriate, sidewalks will be constructed. Stations will provide bike racks.

Comment 14-14

"It is also important that the Southborough Station enable bikers and pedestrians to access Hopkinton State Park. This is a state-funded recreational facility within ½ mile of the proposed station. The FEIR should address how MBTA actions will improve accessibility to this site."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 14-15

"The pedestrian crossovers planned for the station will be unsightly and difficult for the handicapped to use. The Transportation Task Force would prefer a less obtrusive means for crossing the tracks. For example, gates could be used that slide across the fence opening to prevent passengers from crossing tracks as trains arrive and depart. This would be a much less expensive approach with better design and more accessibility for the handicapped."

Response

The MBTA is still evaluating the most effective means for providing an unobstructed continuous path of travel to connect the station platforms and parking areas, including use by handicapped persons. A train-actuated gate system was considered, but not allowed by Conrail who owns the rail line between Worcester and Framingham.

Comment 14-16

"The DEIR is totally focused west of Framingham. There have been safety issues east of Framingham since the start-up of interim service. For instance, in Wellesley people, unaccustomed to trains that do not stop in town, have assumed the incoming train was theirs and stepped in front of a train that was not stopping. Gate systems described above should also be installed at all stations along this line."

Response

Adjustments to train schedules happen independent of Basic Service. Schedules are published to inform riders about scheduled stops. While the MBTA intends to publicize the advent of Basic Service and its schedule to riders east of Framingham, pedestrian circulation issues at existing stations are beyond the scope of this project.

Comment 14-17

"The FEIR should supply a Nyanza siting option that allows current businesses to remain. Ashland cannot afford such a loss of property taxes."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 14-18

"The ENF for Interim Service did not include an evening express stop in West Natick, however, in January one was implemented. West Natick already has severe parking shortages and did not need improved train service prior to new parking. Why encourage more ridership at a station that cannot handle what it has? This change from the ENF should have at a minimum been discussed with the town of Natick and the CAC."

Response

West Natick Station was selected for an express stop due to the use of the mini-high platforms, which gains this end of the Framingham branch full accessability for all patrons of the commuter rail. Until other stations become fully accessible, West Natick Station will continue to have an express stop.

(Also additional information will be addressed in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 14-19

"Based on the interrelationships documented in this DEIR among ridership for Ashland, Southborough, and Westborough, an FEIR for all three stations and the regional station should be done to fully assess impacts. Also, no town should be brought on line before it is assured that its neighbors will also be coming on line within 90 days, otherwise no community will assume the risk of becoming the "new regional station."

Response

See Response to Comments 1-9 and 2-1.

Comment Letter No. 15

Assoc. for Public Transportation/Dennis Campbell (3/8/95)

Comment 15-1

"APT believes there is maybe better train alternatives than the one proposed and there are bus alternatives that are also viable."

Response

Based on the 1990 Feasibility Study and the consultation with numerous agencies, town boards and elected officials during the schematic design phase, the currently proposed project is what evolved and is what the MBTA deems to be the most appropriate commuter rail solution. Bus alternatives are not viable since they would remove only a fraction of the automobiles from the roadways as would be accomplished by commuter rail.

Comment 15-2

"The cost of project, $80 million, will be paid entirely with state funds. Why is the federal government not willing to fund 80 percent or at least 50 percent."

Response

In general, financial assistance from the federal government for mass transportation projects is limited and extremely competitive to acquire. The MBTA has decided to fund this project exclusively from state resources and to seek Federal contributions for more expensive projects.

Comment 15-3

" ... for train alternatives, the overriding principle to commuter rail expansion should be to provide train service where there is a market for trains and not to waste scarce funds on putting trains in uncongested corridors at the expense of others. The FEIR should try to explain how this project is going to relieve congestion on the MassPike if it is intended to."

Response

The DEIR addressed removal of auto trips from MassPike. See Table 5.3-3, as well as the text of DEIR, Section 5.5.

Comment 15-4

" ... regarding the station locations that were originally selected to be able to provide 800 foot raised platforms: since those platforms aren't needed now, the need for straight-track station siting is less. The FEIR should re-examine previously rejected sites in this light and the FEIR should address if the locations are capable of expansion if demand increases. Also, the FEIR should look at whether five stations are really justified in terms of ridership"

Response

See Response to Comment 2-14.

Comment 15-5

" ... the FEIR should analyze for ridership benefits, etc., an alternative that would use the $80 million to improve bus and train service from Framingham. This would involve adding even more parking to the south side of the Framingham station and/or other existing stations and providing express train service from Framingham. It should also look at improving bus service from Shoppers World or another location for north side Framingham commuters."

Response

The MBTA has determined that its proposed project is feasible under DEP regulation and the Massachusetts SIP. Accordingly, no alternative for this project may lawfully be substituted.

Please note that the MBTA, under its agreement of March 30, 1995 with Peter Pan, will subsidize express bus service between Boston and Hopkinton-Ashland-Framingham, Holliston-Ashland-Framingham, and Shrewsbury-Westborough-Southborough until three months after the start of Worcester Rail Basic Service.

Traffic and parking issues at Framingham Station are addressed in Section 8.0 of this FEIR #2.

Comment 15-6

" ... The FEIR should look at an alternative that extends the Framingham line only to Ashland."

Response

The ridership demand reveals that stations between Ashland and Worcester are warranted. With the elimination of just Westborough and Southborough, the ridership for and Ashland Station would be nearly 1,500 patrons in the Year 2011.

Comment 15-7

" ... The FEIR should study a rail extension to serve the Marlborough riders the DEIR states it wants, i.e., a train that terminates at California Avenue at the Framingham Industrial Park."

Response

The 1990 Feasibility Study addressed an Alternative of commuter rail service to Marlborough. Based on the results of the Feasibility Study, the Worcester service was selected as the preferred alternative.

Comment 15-8

" ... the MBTA should consider the fact that bus service has characteristics that are very attractive to many riders, such as better downtown distribution, etc. An alternative should be examined in which bus and train service are coordinated so they complement each other and aren't merely competing for scarce riders."

Response

As the commenter points out, bus service is attractive to many riders. A survey of Worcester Station boardings indicated that few patrons of interim service switched from riding the bus. Transit ridership demand is deemed great enough to support both modes.

Comment 15-9

" ... if the bottom line is to get drivers off the roads, the FEIR should look at the full impact of providing a subsidy for bus service to equalize the train-bus fares, and it should include an aggressive bus service alternative."

Response

As noted below (Response 15-11), fare structures are quite competitive at present.

Comment 15-10

" ...The Massachusetts Turnpike Authority is expanding its park-and-ride facilities. A park-and-ride lot at the Route 495/MassPike interchange (Exit 11A) could be a particularly good location to capture bus commuters. This should be discussed in the FEIR."

Response

The comment is noted. The Turnpike Authority could provide facilities there, subject to the same ACEC constraints faced by the MBTA in siting a regional station in that area.

Comment 15-11

" ... The FEIR should analyze and quantify the impacts of equalizing the train fares with bus fares."

Response

Train and bus fares are relatively equal at present. Based on fare data in the DEIR, a bus ride from Southborough to Boston on Gulbankian Bus Lines would be $2.70 each way (with a 10 ride coupon book). Proposed MBTA monthly pass to Southborough is $112; based on 40 trips per month, the one way fare is $2.80.

Comment Letter No. 16

MASCO/Robert Tassinari (2/16/95)

Comment 16-1

" ... the DEIR is limited in that it does not include the potential for a new station at Kenmore Square (Yawkey Way) and its connection with the Urban Ring."

Response

The focus of this project has been on extending commuter service to locations west of Framingham. Thus, a new station at Kenmore Square was not considered as part of this project, although future consideration by the MBTA is not precluded by this project.

Comment Letter No. 17

MBTA Advisory Board, Capital Planning Commission/Bernice Mader (3/8/95)

Comment 17-1

"The current Draft does not contain a needs analysis, the most necessary ingredient required to address the questions of the 'no-build' alternative and the comparisons of transit mode options."

Response

The purpose and need for the Worcester Commuter Rail Extension are addressed in Section 2.0 of the DEIR. Changing demographic trends reveal substantial population and business development in the service area. The proposed project addresses the need to reduce commuting by automobile, thus improving air quality and reducing traffic

congestion on major routes and local roads. No other alternative, including no-build, can produce the desired results.

Comment 17-2

"The fact that the draft uses an outdated financial feasibility analysis of the old Colony Rail Restoration (OCRR) Project as its fiscal baseline is outlandish and inappropriate. In 1994, the FTA required the MBTA to produce an updated fiscal study on the OCRR. This financial analysis is not even due to be publicly released until May of 1995."

Response

Please see Section 2.0 on the relation between this project and the MBTA's overall financial capacity.

Comment 17-3

"Even though the Worcester Interim Service is funded with State monies, because the MBTA as an entity receives federal funds for its operating budget, it may still be subject to the mitigation requirements of 13 (c). If any project funded by federal taxpayer dollars is instituted and directly competes with an already existing private service, and the private service is harmed or permanently damaged, the private service providers are entitled to reparation payments, not only on a one time basis, but for a seven year period."

Response

There are no mitigation requirements connected with the so-called 13(c) provision. Please see the Response to Comment 2-50 for an explanation.

Comment 17-4

The analytical figures used in the report are from an outdated 1989 Feasibility Study. What should have been necessary analytical data were omitted from the study of alternatives. Consequently the analysis of the 'no-build' alternative is both inadequate and flawed."

Response

The DEIR also estimated 1994 costs. The MBTA notes, in any case, that, under DEP regulation and now the Commonwealth's Clean Air Act State Implementation Plan, No Build is not a tenable project option.

Comment 17-5

"Figures presented do not compare equivalent measures. One of the best examples of this disparity lies in the tables on pages 4-12 and 4-14. The tables purport to examine equivalent net annual costs of the various alternatives, yet the tables on 4-12 and those on 4-14 do not use equivalent units of measurement. One striking example is the table on 4-14, where the costs for land are annualized over a 100 year period. Using that as a first measure to get to the net annual cost of the Commuter Bus Alternative is not the same method that was used on 4-12 to arrive at the net annual cost of Rail Alternatives."

Response

The DEIR reported some analyzations from the feasibility study and developed new analyzations. The new analyzations all follow the same method, cf. p. 3-50, Table 3.6-2 vs. p. 4-14, Table 4.2-1. The feasibility study annualized land at 100 years, as do both these cited DEIR tables. Table 4.1-7 and Table 4.1-8 on page 4-12 are not intended to be comparable to Table 4.2-1 on page 4-14, but to Table 4.2-2 on page 4-14.

Comment 17-6

"On page 1-19 of the DEIR, in paragraph 3, it states that 'private bus figures are not available as they are not public information.' The is an incorrect statement as the companies willingly and promptly provide the figures over the telephone."

Response

The MBTA's experience, in developing the DEIR and since, has been that companies to which it does not give subsidies do not willingly provide ridership figures.

Comment 17-7

"In choosing the commuter rail expansion, the Draft has completely disregarded an examination of the currently functioning private bus carriers. As it is currently laid out, the Bus Alternative is very distorted. It appears to base its costs and operational assumptions on the premise that the MBTA itself would run the bus service, not the private carriers which have specialized in transporting commuters from Worcester and its environs to Boston and Cambridge. Further, the DEIR uses Amtrak private service figures for the 'no-build' alternative, but for the bus alternative, it uses MBTA public service data."

Response

The MBTA examined alternatives to Worcester Rail with regard to meeting the regulatory standard of 310 CMR 7.36. Once it was determine that Worcester Rail was not infeasible, alternatives to it could not lawfully be pursued, and were not examined further.

Comment Letter No. 18

Preservation Worcester/Patrick O'Mally Hagan (2/27/95)

Comment 18-1

"The DEIR defines an interim station and Layover facility to be located adjacent to the existing Amtrak Station and close to Union Station. PW endorses this plan which would accommodate the existing demand for commuter rail now equaling over 500 riders a day. It also fully expects and plans for Union Station to become the station for the commuter rail extension, once rehabilitated. PW urges that plans to retire the interim station and remodel the layover facility be included in greater detail in the DEIR."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

Plans to "retire" the Interim Station are limited to the removal of the access platform and canopies. The existing parking facilities and amenities (sidewalks, lighting, etc.) will remain and serve Union Station as supplemental parking. Existing signage will be removed, reset, or replaced as required. This work will be coordinated with the Worcester Redevelopment Authority during transition from Interim to Union Station. No plans to remodel the layover facility are anticipated with the possible exception of redesignating additional employee parking.

Comment 18-2

"PW endorses the Worcester Office of Planning and Development's request that the MBTA make the layover facility a double-ended facility once Union Station is operational."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The layover facility site has insufficient land area to accommodate a double-ended facility. Even without the Interim Station, the track extensions for a double-ended facility would encroach into the Union Station site.

Comment 18-3

"The issues of air quality and noise are of great concern to the residents of the area and will impact business and residential development in the area. Both issues are addressed in the DEIR. Analysis demonstrates a worst case scenario would comply with safe federal guidelines. The reviews, however, were based on new trains, not older models. PW recommends guidelines should be established to assure that only safe, newer trains would be used, not the older trains which would not meet safe standards."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

To provide maximum flexibility in meeting scheduling and maintenance, it is not practical to designate specific train equipment to a particular commuter rail line. The air and noise analyses have been revised for the layover facility, taking into account the mix of old and new locomotives. (See Sections 6.2 and 6.3 of FEIR #1.)

Comment Letter No. 19

Worcester Office of Planning and Community Development/Stephen F. O'Neil (2/24/95)

Comment 19-1

"The current interim service schedule does not provide for evening or weekend service from Boston to Worcester. In light of the important role passenger rail plays in Downtown development and the reverse commute numbers displayed in Table 2.3-5, OPCD encourages the project proponents to amend the current interim service schedule to include reverse commuting, non-peak hour, and weekend service."

Response

Upon the implementation of Basic Service, there will be 10 trains daily to and from Worcester, an increase from the current Interim Service of 6 trains to 20 trains. (Also see Response to Comment 2-35.)

Comment 19-2

"OPCD requests information regarding the remodeling of the layover facility once the rehabilitation of Union Station is complete."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

No remodeling of the layover facility is anticipated once Union Station is complete, with the possible exception of redesignating additional employee parking if required. (Also see Response to Comment 18-1.)

Comment 19-3

"Also, once completed the rehabilitated Union Station will become the station for the commuter rail extension. The need for a passenger platform at the current Amtrak station would no longer exist. OPCD requests that the MBTA consider making the layover facility a double-ended facility at that time. Such a remodeling may also eliminate the possibility for conflict between the facility and an existing sidetrack and allow larger vehicles to access the train sets."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The site has insufficient land area to accommodate a double-ended layover facility. In addition, although the Interim Station platform would no longer be required once Union Station is complete, the Interim Station parking facilities would serve Union Station as supplemental parking.

Comment 19-4

"In regards to air quality, the DEIR reviews a worst case scenario of the F40PH-2C and F40PH-2 locomotives likely to see service in Worcester. In this scenario there are no violations of the NO_2 standard. The worst case scenario only reviews those locomotives

that are likely to see service on the Worcester Extension, it does not review the potential emission factors of older locomotives such as the 1000-Series (F40PH)."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The FEIR addresses the NO_2 standard in terms of a locomotive mix that is representative of the normal south side equipment. (See Section 4.2.) In addition, a worst case analysis was performed, using only the older locomotives - a very unlikely situation given that the NO_2 standard is expressed in terms of a one year, averaging period. Even for this very unlikely scenario, there would be no violation of the NO_2 standard.

Comment 19-5

"The DEIR notes assumptions regarding the idling needs of the newer 1050 series locomotives and provides for mitigation strategies. The DEIR does not mention strategies for the older 1000 series locomotives. Additionally, the DEIR provides the result of a "Pure Tone" Analysis in which the 1050-Series meets the Department of Environmental Protection's guidelines concerning sound characteristics. The 1000-series does not meet these guidelines.

Until such time that the MBTA can ensure and demonstrate that 1000 series locomotives will not be stored at the facility, OPCD requests that a mitigation strategy be developed for instances when the 1000-series locomotives are required to layover. The MBTA has already demonstrated a desire to cooperate with the City on this issue."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

The revised noise analysis for the layover addresses the differing idling conditions for all series of locomotives. While the 1000-Series does not comply with the DEP guidelines on pure tone, retro-fit noise abatement for these locomotives is not practical. Given the average age of 17 years, most are likely to be retired from service over the next decade. (See Section 6.3.)

Comment 19-6

"In light of recent events at the temporary layover facility, OPCD urges the MBTA to use all expediency in the construction of the new layover facility. The temporary facility is

currently located in the Providence and Worcester rail yard and has been the target of criticism by abutting residents. The complaints are in regards to overnight noise and diesel fumes emitted by the idling engines. To the MBTA's credit, steps have been taken to minimize the noise and fume problems. Despite the changes, one engine will continue to idle throughout the night. Because layover operations may be considered more intrusive than normal train noise, the possibility for future complaints still exist. The sooner the new layover facility becomes operational the sooner the trains can be moved away from the sensitive receptors in the vicinity of the Providence and Worcester rail yard."

Response

(The following response was presented in FEIR #1, Railroad Right-of-way and Layover Facility, July 1995)

In April 1995, the MBTA installed an electrical power source at the temporary layover, eliminating the need for locomotives (one or more) to idle overnight. Every effort is being made to accelerate the permanent layover construction schedule.

Comment Letter No. 20

Union Station Alliance (3/9/95)

Comment 20-1

"Interim commuter rail service to Worcester has been an enormous success. Approval of the DEIR will allow the project to expeditiously move towards completion so that full service will be brought to Worcester by the end of 1996. There is enormous interest in full service in the City of Worcester, and the sooner it gets here the better it will be for the both the City and the region."

Response

None required. The MBTA plans to work with Worcester officials and those in the communities between Worcester and Framingham to assure that commuter service meets the needs of each community.

Comment Letter No. 21

Andrew B. O'Donnell/Member Worcester Commuter Rail Task Force(3/9/95)

Comment 21-1

"I strongly endorse the commuter rail DEIR and urge your office to issue a certificate for the project."

Response

None required.

Comment Letter No. 22

Worcester City Manager's Office/Thomas Hoover and David Forsberg (3/13/95)

Comment 22-1

"We are writing to express our support for the extension of commuter rail service to the City of Worcester from Boston."

Response

None required.

Comment 22-2

"We would respectfully request a favorable certificate for the MBTA's Final Environmental Impact Report (FEIR). The MBTA and the City agree that the preliminary ridership estimates are conservative at best. We do not believe that an increase in daily trips will have an adverse environmental impact on the corridor. In fact, increases in commuter rail ridership means less traffic on our highways resulting in improved air quality."

Response

None required. The MBTA concurs with the optimistic statements made by the Worcester City Manager Office.

Comment Letter No. 23

Worcester Business Development Corporation/Thomas J. Andrews (3/9/95)

Comment 23-1

"The traffic study apparently does not assign any [Grafton] station traffic to Green Street in Shrewsbury. Green Street is the continuation of Pine Street which connects to Route 20 opposite South Street in Shrewsbury. We suggest that the proponent should have assigned some project traffic to Green Street."

Response

Under the premise that all five stations will be built between Worcester and Framingham, the Grafton Station will attract 116 commuters in the year 1996 from the towns of Grafton, Shrewsbury, Sutton, Boylston and Northbridge. The travel routes from each community to the station are presented in Section 13.1 of the DEIR. For communities northerly of the station -- Shrewsbury and Boylston -- the primary access will be via southbound Route 140 to Westborough Road to Pine Street. Although Route 20 would serve the easterly section of Shrewsbury, Green Street is not considered a primary station access route since it is a narrow, winding road. For that reason, only 5.5% of the station traffic is assigned to Green Street.

Comment Letter No. 24

Millbury MBTA Advisory Committee/Brennan F. Wall (2/1/95)

Comment 24-1

"We suggest that the level of detail in the Final report be expanded with respect to the maintenance responsibility for catch basins, silting basins, grease traps and other drainage facilities."

Response

Maintenance associated with stormwater management of the Millbury Station is addressed in Section 6.5 of this FEIR #2. In addition, specific details will be discussed and included in the Notice of Intent Application which is being filed with the Millbury Conservation Commission.

Comment 24-2

"We would like to see the intensive archeological survey that is promised in the Final report."

Response

A brief summary of the intensive archaeological survey for the Route 20 Millbury Station site is included in Section 6.7 of this FEIR #2. Also see MOA in Appendix H.

Comment 24-3

"We suggest that the DEIR fails to adequately support the need to locate the commuter rail station in the vicinity of the Massachusetts Turnpike."

Response

Further examination of the Millbury Station siting has resulted in the selection of the Route 20 Millbury Station option.

Comment 24-4

"We ask that the Final report provide more traffic mitigation information than is available in the DEIR at section 12.12."

Response

Section 12.12 covers mitigation for the Millbury Route 122 Station option, which option has been dropped from consideration. Please refer to Section 6.12 of this FEIR #2 for the Millbury Route 20 Station mitigation.

Comment 24-5

"Current traffic data from the Central Massachusetts Planning Commission appears to indicate that the intersection of Route 122 and Route 20 in Worcester may warrant some amount of traffic mitigation."

Response

The Route 122/Route 20 intersection does operate at Level of Service (LOS) E or F for certain movements in both the A.M. and P.M. peak hours. The introduction of station traffic for the Millbury Route 20 Station does not significantly affect this situation . See Section 6.2 of this FEIR #2.

Comment 24-6

"We ask that additional traffic mitigation information be included in the Final Report".

Response

Since the Route 20 Millbury Station option is now the proposed station, mitigation in the form of a new signalized intersection at Route 20 and the station access road is proposed to address the traffic impact at this location. No other Millbury or Worcester intersections or roadways require mitigation as a result of implementing the Route 20 Millbury Station.

Comment 24-7

"Some members of our committee suggest that the Summary of Findings in the DEIR tends to simplify the difficulty faced by persons who live within the "study area" to enter or exit their streets or homes from Route 122 during certain peak hours."

Response

The selection of the Route 20 Station Option will not result in adverse effects along Route 122.

Comment 24-8

"We find it difficult to support the taking of any property."

Response

Property acquisition for Millbury Route 20 Station will not affect residential properties in Millbury.

Comment 24-9

"We believe that the Route 20 Access Road design may be improved to better encourage economic expansion along Route 20."

Response

The MBTA intends to make the intersection of the station access road with Route 20 user friendly. The proposed signalized intersection, coordinated with the signal at Sunderland Road, should enhance traffic operations in the immediate area.

Comment 24-10

"We believe that more economic development will be encouraged by the location of a commuter rail station with an access road from Route 20 than will be encouraged by a commuter rail station with an access road from Route 122."

Response

The MBTA does not disagree with the stated premise. For it and other reasons the Route 20 site has been chosen for the Millbury Station.

Comment 24-11

"Given the remote nature of the station sites, we ask that the Final Report address the relative safety of individual passengers waiting at either of the two proposed Millbury stations."

Response

The safety of passengers is of concern regardless of location. Typically suburban stations and parking lots are checked by municipal police as part of routine patrols.

Comment 24-12

"We ask that the Final Report evaluate which station site is more conducive to encouraging commuters to walk or to ride bicycles to the station."

Response

No commuters are projected to be walking to either of the Millbury Station sites. As such, walkers to the station were not a determining factor in selecting the Route 20 option.

Comment Letter No. 25

Tufts University/Franklin M. Loew (2/24/95)

Comment 25-1

"I am strongly in favor of this project proceeding as planned by the MBTA. I am especially interested in seeing that the Grafton stop on this route be completed."

Response

The Grafton Station, along with he Millbury Station, are anticipated to be operational by December 1996.

Comment Letter No. 26

Grafton Board of Selectmen (3/6/95)

Comment 26-1

"The DEIR indicates that mitigation of the effects of blasting will be done. General soils maps show some shallow hardpan in this area, but do not detail ledge or boulders. The Final EIR should contain more information on this."

Response

As a rule, blasting is not allowed along Conrail's Right-of-Way, and as such none is expected. In the unlikely event, after all other methods prove ineffective, and blasting is the only alternative, Conrail's requirements (to protect the railroad) would prove more than adequate mitigation for the surrounding area.

Comment 26-2

"Section 13.12 addresses mitigation at two intersections which both have a level of service (LOS) rating of "F". The Town should be involved in any discussion about possible mitigation measures. Obviously, we will be unable to support a program which could result in congestion and circulation problems."

Response

The Draft EIR demonstrated that intersections of concern to the Board of Selectmen will operate at LOS F with or without the project. According to the mitigation policy, in such cases the MBTA will not assume responsibility for fixing a failing intersection since the failure is not attributable to the project. Also consistent with the policy, the MBTA will be pleased to work with the community in mitigation of traffic impacts at such locations.

Comment Letter No. 27

Southborough Board of Selectmen (3/7/95)

Comment 27-1

"We want a regional station instead of local stations. Do not build local stations by 1996, but rather put the Regional station on-line first, then smaller local stations if needed."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Also see Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment 27-2

"Undoubtedly the ACEC status of Cedar Swamp presents a problem for citing a Regional Station, but positive, creative solutions may yet be found if really desired. The FEIR should continue to look at regional station options and not drop the topic as proposed in the DEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Also see Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment 27-3

"Southborough recommends that the MBTA redesign the Mass Turnpike/I-495 site to resolve access and wetlands problems. Given the new "state control" orientation in Washington, it may be possible to get a waiver for site access directly off of a turnpike ramp or closer than one mile apart from existing exits. Much more attention is needed in this area."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Also see Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment 27-4

"The CAC and the Town have decided we are at an impasse with the MBTA. The Secretary must decide whether to push this issue [local assessments] further in the FEIR."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR certificate. See Appendix A.

Comment 27-5

"Town desires to sign a legally binding agreement with the MBTA that stipulates that 420 spaces is the maximum number to be located at this site, unless the Town petitions the MBTA for an expansion."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-6

"Town wants to be on record as having interest in maintaining and policing north parking lot, in order to establish a "resident parking only" area. This will also help alleviate traffic problems along Southville Road. by decreasing the number entering/exiting north lot."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-7

"Town wants to be on record, that the now documented interrelationship among station sites requires that at a minimum Ashland, Southborough, and Westborough stations open simultaneously. FEIR should make a commitment to this schedule, or provide full disclosure of their station schedule and do full analysis of traffic, noise, etc. impacts for any station brought on line before the others. The host community should retain the right of refusal to bear these impacts albeit temporary."

Response

See Response to Comment 2-1.

Comment 27-8

"Based on the findings in DEIR, the Secretary's special procedures memo should be amended. The Secretary previously stated stations could be segmented and the FEIR process done as each station is ready to come on board. The DEIR documented that this process will not work."

Response

See Response to Comment 2-1.

Comment 27-9

"Numerous references are made to cost sharing with other agencies while this project is being completed, i.e. Conrail, EOTC and MHD. The FEIR should address the "certainty" of that funding being available to defray project costs and timing of its availability."

Response

Please see Section 2.0 on the relation between this project and the MBTA's overall financial capacity.

Comment 27-10

"The cost estimates in the DEIR do not necessarily cover off-site mitigation such as sidewalks, traffic signals, intersection/roadway widenings and resurfacings. The FEIR should address what mitigation will be paid for with the $78 million budget and what will require other funding and from whom. It then should address again availability and timing of funding from other sources. All mitigation must be completed prior to the opening of this station."

Response

The MBTA commits to providing timely all the mitigation determined to be necessary as the result of the project's MEPA review. The MBTA will provide this mitigation within the project's present budget.

Comment 27-11

"It is the unanimous position of this Committee that there should not be a pedestrian overpass at this site [Southborough Station.] "We remain committed to either of two options."

Response

At the present time, the elimination of a pedestrian overpass is being considered. The Route 85 Railroad bridge is now planned to accommodate a wider sidewalk on the west side which would connect to the station platforms by ramps and stairs.

(Also additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-12

RE: Elimination of proposed pedestrian overpass

"A. Our first priority is to re-activate the existing underpass or build a new one. The old or new underpass must be well lit.

B. An alternative is to install pedestrian gate system at-grade preventing commuters from crossing tracks when train is approaching/departing."

Response

See Response to Comment 2-9 and 27-11.

Comment 27-13

"The FEIR should clearly state where sidewalks will be extended, width curbing, etc. The Town wishes to reiterate our previously filed list of where we desire sidewalks. This list is attached to this Comment Letter."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-14

"It has been agreed that sidewalks will be built in the proximity of, as well as on, the station site. This station has a high potential to service Hopkinton State Park. Thus, the sidewalks exiting onto Route 85 at the new access driveway should provide crosswalks to get park users on the right side of Route 85. These crosswalks may also need pedestrian lights to assist safe crossings during peak hours."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-15

"Pedestrian activated traffic signals will be needed at Route 85/Southville Road intersection and crosswalks will be required to help people cross Southville Road to access the station and General Store."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Please note that a new signal system is under study for the above intersection.

Comment 27-16

"The Town strongly disagrees with the supposition that traffic problems at the Route 85/Southville Road intersection can be remedied by merely re-timing existing traffic signal. Instead of arguing about this, we request that the MBTA petition MHD District 3 now to retime these lights, and then conduct additional, comparative analysis in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Please note that a revamped intersection including a new signal system and exclusive turning lanes, is under study.

Comment 27-17

"Southborough does not agree with your projection that 50% of the Upton train riders already use Southborough as their route to the Mass Pike (p.15-11). To save time, Upton uses I-495 to the 11A entrance to Mass Pike. Traffic impacts resulting directly from the station should be adjusted upward in the FEIR."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-18

"Southborough Study Group wants to be on record as supporting traffic mitigation at Route 85/30 intersection, assuming it can be achieved without forfeiting town character. This scenic intersection defines Southborough, it is here as opposed to our Business Center, that artists depict Southborough. Thus modifications, although sorely needed, must be designed carefully."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-19

"The Town offers a suggestion regarding LOS problems at the intersection of Route 85 and Southville Road, especially if Cordaville Road is shut off at River Street, as requested. It has been suggested that a right hand turn lane could be cut into existing vegetated triangle to decrease queue on Route 85 southbound. The FEIR should analyze this option in conjunction with the short leg of Cordaville Road being closed."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-20

"The DEIR measures traffic impact in terms of LOS decreases only. We believe intensity and duration of impacts are an issue. The DEIR clearly shows that our peak traffic hour will be extended by the station's peak generator hours in both morning and evenings. The time frame nearly doubles in the evening and will be very disruptive in this rural residential area."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-21

"The access drive for the south parking lot must be better defined in the FEIR. We have concerns about both: (1) left turn of northbound a.m. traffic into lot and (2) left turn out of driveway due to bridge abutment obstructing views. FEIR should also address, as previously scoped, how the bridge widening will occur without impacting on historic character of the bridge. The bridge should remain granite and not a concrete retaining wall."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Please note that a replacement bridge will eliminate the lines-of-sight deficiency. In addition, the bridge abutments are planned to have a surface treatment which will replicate the granite block abutments.

Comment 27-22

"We reiterate our request for all roadway improvements to create bike path lanes, particularly to extend our existing one from Richards Road to Hopkinton State Park or even Hopkinton Center. FEIR should explain in detail just what the MBTA plans are for improved bike access to their stations."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-23

"Site Plan in DEIR fails to address bike usage onsite or on train. We request bike lockers at this station."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-24

"Town still wants Fitzgerald's Store and Ipanema Restaurant assessed for noise and vibration impact both during construction and normal train operations. They are the

properties closest to this proposed train stop. We also want more detail in the FEIR about specific mitigation being offered in Southborough to residential and commercial properties."

Response

Refer to Response to Comment 2-61 for discussion of lack of applicable criteria for commercial buildings. If considered "Institutional land uses with primarily daytime use," then the vibration impact criterion for both construction and operations would be 83 VdB (Table 4.3-1 of Railroad ROW FEIR). The threshold for any damage from vibrations is 100 VdB. Similarly for noise impact, a worst case assessment would be to consider the commercial land to be equivalent to the most sensitive criterion used in the FEIR, that is, if the buildings were considered residential use with nighttime sensitivity. The "Severe Impact" threshold of the criteria shown in Appendix would therefore be applied. Construction noise criteria, as discussed in Section 4.3 of the Track and Layover FEIR, are based on an outdoor annual average L_{dn} of 65 dBA.

Following are the noise and vibration levels projected to occur at the two sites in question, along with an assessment according to the above-mentioned criteria:

Exterior noise levels at Fitzgerald's Store are projected to be:
- Existing (track side): L_{dn} = 66 dBA
- During construction : L_{dn} = 59 dBA (with some night work) (No Impact)
- Basic Service operations with no station:
  - MBTA alone, L_{dn} = 62 dBA ;Total L_{dn} = 68 dBA. (No Severe Impact)
- Basic Service operations with station:
  - MBTA alone, L_{dn} = 59 dBA ;Total L_{dn} = 67 dBA. (No Severe Impact)

Interior vibration levels at Fitzgerald's Store are projected to be:
- During construction : 59 VdB (No Impact)
- Basic Service operations with no station: 79 VdB (No Impact)
- Basic Service operations with station: 67 VdB (No Impact)

Exterior noise levels at Ipanema Restaurant are projected to be:
- Existing (track side): L_{dn} = 70 dBA
- During construction : L_{dn} = 63 dBA (No Impact)
- Basic Service operations with no station:
  - MBTA alone, L_{dn} =66 dBA ; Total L_{dn} = 71dBA (No Severe Impact)
- Basic Service operations with station:
  - MBTA alone, L_{dn} = 63 dBA ;Total L_{dn} = 71 dBA. (No Severe Impact)

Interior vibration levels at Ipanema Restaurant are projected to be:
- During construction : 67 VdB (No Impact)
- Basic Service operations with no station: 84 VdB (Impact, No Damage).
- Basic Service operations with station: 73 VdB (No Impact)

Comment 27-25

"What are the speeds the train will be traveling as it traverses Southborough both with and without a station?"

Response

With a Southborough Station, the train will be in either an acceleration or deceleration mode in this area. Speeds will be 53 miles per hour or less, approaching a stop condition at the station platforms. Without a Southborough Station, train speed will vary between 53 and 60 mph.

Comment 27-26

"There is not enough explanation in the DEIR to make noise impacts understandable to the average reader. The FEIR should clearly explain and elaborate on these noise impacts. Data should not be buried in the appendix which requires a level of expertise not possessed by the average reader from the impacted communities. FEIR should do this work for the reader in an easily understood manner."

Response

An update of impacts is discussed in Section 5.1 of the FEIR for Millbury and Grafton stations. The introductory material attempts to explain, as simply as possible, the noise descriptors and criteria.

Comment 27-27

"Residential neighbors that live on the hills overlooking the proposed station in Southborough and Hopkinton have expressed concern over how the noise analysis was done. First, noise impact should be calculated during both day and night time, because sound carries differently when there is less ambient noise in the evening."

Response

The noise descriptor used in the noise impact assessment is the day-night sound level (L_{dn}) which is particularly sensitive to noise events occurring at night when the ambient is low.

Comment 27-28

"Second, noise rises and defuses as it rises. Yet the noise analysis is always taken at ground level. The Town requests that dBA analysis also be done in the neighborhoods on the hill during both morning and evening conditions."

Response

The standard reference point for community noise analyses is 5 feet height above ground level, which approximates the ear height of a standing person and the height above ground of first floor windows of typical homes. Generalized terrain features, such as hills and intervening buildings, are taken into account in the noise projections. The noise descriptor used in the assessment, L_{dn}, is considered to represent the cumulative effects of both morning and evening conditions.

Comment 27-29

"Reverse Commute - The schedules provide for it, and the chart clearly indicates that Southborough has 113 people who work in Worcester. However, no ridership or air quality credits are taken for all these outbound stops in the a.m. or inbound stops in the p.m. The FEIR must calculate feasibility and ridership for reverse commute. It must also recalculate cost and air quality benefits if in fact there is additional ridership."

Response

See response to Comment 2-34.

Comment 27-30

"Weekend Service - will there be weekend service as originally promised under Basic Service? If it has a station, Southborough definitely wants weekend service schedule. The Town has nearly 7,000 residents, but only 90 are projected to use the station to go to work. If the other 6,900 residents must put up with the inconveniences of a train station for regional benefits, they should at least be able to get to Boston or Worcester on the weekend."

Response

See Response to Comment 2-35.

Comment 27-31

"The MEPA Scope stipulated that station design should reflect "Village Business" character as articulated in our zoning. Thirty foot high light posts have never been

allowed anywhere in Town, not even our Industrial Parks, let alone Village Districts. The maximum height is twenty feet."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-32

"The work planned for this Extension should in no way preclude the electrification of this line. In fact, electrification should be a goal."

Response

Implementation of the proposed project does not discount the possibility of future electrification, although no such option is being considered at the present time.

Comment 27-33

"The Town continues to request that since your plans require General Store to re-orient parking and store entrance to east side of lot, then the MBTA should provide that parking and new entrance. The FEIR should explain how this will be mitigated."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 27-34

"We expect that the FEIR will clarify what specific mitigation is to be offered, when and at whose expense. Until these basic questions are addressed, Southborough cannot take a position on whether it will host a station."

Response

The Draft Section 61 Findings will provide a detailed listing of mitigation commitments including scheduling and responsibility for implementation. The appropriate information will be in FEIR #3 covering the Westborough, Southborough, and Ashland Stations.

Comment Letter No. 28

Westborough School Committee/Lydia DaSilva (3/1/95)

Comment 28-1

"We are concerned about the impact which the traffic heading to and from a MBTA parking lot will have on the safety of the children walking or being transported to and from the schools. One of the major roads leading to the schools, Maynard Street, is a very narrow street with no sidewalks. Maynard Street currently has a large automobile and truck traffic volume and is used as a shortcut to Route No. 9 by morning commuters. In addition to the students walking to these two schools, there are a number of students waiting to be bussed to their individual schools along many narrow streets leading to Fisher Street. Many of these students are of elementary school age, Kindergarten - Grade 4."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 28-2

"In its previous letter to you dated September 18, 1992, the Westborough School Committee established some safety priorities and requested that you consider the following concerns:

- Reduce the size of the lot from 600 to 300 cars;"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Please note that the proposed Westborough local station will provide parking for 300 vehicles.

Comment 28-3

"In its previous letter to you dated September 18, 1992, the Westborough School Committee established some safety priorities and requested that you consider the following concerns:

- Improve the sidewalks and crosswalks in the location between the lot and the neighborhoods surrounding the schools;"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 28-4

"In its previous letter to you dated September 18, 1992, the Westborough School Committee established some safety priorities and requested that you consider the following concerns:

- provide funds to offset the cost of any additional crossing guards or bus routes which are deemed necessary to ensure the safe transportation of our children."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment Letter No. 29

Westborough Planning Board/Richard Brady (2/21/95)

Comment 29-1

" ... the Westborough Planning Board cannot endorse the proposed Smith Valve site for a local commuter rail station in Westborough."

Response

None required.

Comment 29-2

"We feel that some critical issues, including identifying potential access routes, were not adequately addressed."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-3

"The Board believes that local mitigation expenses will be significant and that the possibilities for construction of a regional station should receive substantially more consideration and investigation."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Also see Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment 29-4

"Even with significantly more riders originating from surrounding towns (Northboro, Upton, Shrewsbury), how does this ridership [22 riders from Westborough] justify locating a station in Westborough in light of potential local mitigation costs?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Also refer to revised ridership projections in Appendix D.

Comment 29-5

"How are the access issues for Westborough and surrounding user towns better addressed with a local station as compared to a regional stations?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-6

"Current ridership projections for Westborough and surrounding user towns to not appear to account for present and future land use development. Over the course of the past year,

the MBTA has not contacted the Planning Board to account for future local development plans. These plans will affect ridership. Local housing and commercial growth both generates and attracts trips. Given these factors, ridership estimates may be low. Furthermore, since development is also increasing in surrounding towns, estimates of incoming riders is probably also inaccurate."

Response

See response to Comment 14-4.

Comment 29-7

"Future development plans in Westborough along Route. 9 (WalMart and a new shopping center proposal at the intersection of Route. 9 and Milk Street/Route 135) will impact the level of service provided at key intersections targeted along access routes to the Smith Valve Site."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-8

"Given that the Otis Street Route. 9 intersection is currently at failure and even with an approved turning lane onto Otis Street, commuter traffic is most likely to seek the shortest routes with least stopping time."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-9

"Traffic from Shrewsbury is likely to travel Walnut Street to Gleason Street. Northborough commuters can be expected to travel Route. 135/Milk Street to Maynard Street. Traffic from Upton and Westborough is likely across West Main, Mill Road, and Fisher Street. Additional in-town traffic is likely across School Street, Milk Street, Maynard Street, and Fisher Street."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-10

"Since the proposed station for the Town of Southborough will have parking constraints, Westborough will realize a large portion of Southborough ridership."

Response

Most of the ridership to Southborough station is projected to come from Southborough, Marlborough, Upton, Westborough, and Hopkinton. If Southborough is parking constrained, some trips would be diverted to Ashland Station. Westborough Station would not experience a significant increase in trips because for those living in Southborough and Hopkinton, going to Westborough Station would involve making a reverse trip.

(Additional response will be in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-11

"The MBTA study overlooked the major possibility of commuter pass-through traffic across Maynard Street. Maynard Street is one of the most direct routes to the Smith Valve station. This is a country road. In its present state, it is not capable of safely handling peak hour commuter traffic. The road width, site distances, and lack of roadway shoulders will not be suitable for fast moving commuters. In addition, the street presently includes an old bridge which is not passable to 2-way traffic."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-12

"The assumption that residential streets would only experience local traffic is naive at best. The EIR's statement that no 'new' traffic would be generated on Fisher Street is very hard to believe in light of the travel pattern stated above."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-13

"Presently, the MBTA projects that the commute time from Worcester to Boston is 65-70 minutes, with no stops between Worcester and Framingham. The MBTA also projects that this travel time will remain unchanged even after the addition of five (5) local stops between Worcester and Framingham. How is this possible with a minimum terminal time of 2 to 3 minutes at each local stop?"

Response

Please refer to Section 4.2 of this FEIR #2. Approximate train departure and arrival times are presented for Interim Service and for Basic Service. Interim Service trains run express from Worcester to Framingham, then after a stop at West Natick, run express to Boston for a total Worcester to Boston commute of 60 minutes. If all stops are made between Framingham and Boston, the commute time increases to 77 minutes. Under Basic Service, with all stop made between Worcester and Framingham, then express to Boston, the commute is 70 minutes. Trains making all stops between Worcester and Boston increase the commute time to 90 minutes.

Comment 29-14

"There is no provision for weekend service for the new stations. How does this train serve the local non-commuter residents, all of whom will be equally responsible for paying local service assessment fees. With a projected ridership of only 22 commuters per day in Westborough, how are the majority of local residents served?"

Response

See Response to Comment 2-35. Also see revised ridership projections in Appendix D.

Comment 29-15

"At the very least, Fisher Street will require upgrading including widening and possibly sidewalks. In addition, the development of a 120 unit apartment complex at Fisher Street and Gleason Street may generate walking traffic to the proposed station. This may also require sidewalks to protect public safety."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-16

"There is the possibility of the need to upgrade local bridges presently on residential streets. This may be required as a result of demand for a higher level of service along access routes to the station."

Response

The anticipated distribution of station traffic will not result in impacts on local bridges, as the magnitude of increase in traffic is small. There are local bridges that likely warrant improvement with or without a local commuter rail station.

Comment 29-17

"Will the Town of Westborough be responsible for these possible mitigation costs?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-18

"What is the real likelihood of Westborough being charged an assessment?"

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR certificate. See Appendix A.

Comment 29-19

"What is a real estimate of such an assessment?"

Response

See response to Comment 29-18.

Comment 29-20

"If the present ridership projections are realistic, how equitable would an assessment be to the taxpayers?"

Response

See response to Comment 29-18.

Comment 29-21

"If the Town must pay for mitigation, would an assessment be equitable?"

Response

See response to Comment 29-18. The MBTA anticipates that mitigation due to project impacts will be paid by the MBTA.

Comment 29-22

"If the regional station is a viable alternative, why hasn't there been further study on this alternative?"

Response

See Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment 29-23

"Without a regional station, and with parking constraints at the Southborough location, Ashland will likely become a regional station (EIR, p. 17-4). This scenario places still further strain on local streets in Ashland. What are the local mitigation costs?"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 29-24

"The MBTA should conduct further study of the feasibility of a regional site. It is possible that the Commonwealth as well as local towns could save real dollars in acquisition, construction, and mitigation if a regional site was developed."

Response

See Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment Letter No. 30

Westborough Board Selectmen (3/6/95)

Comment 30-1

"The Selectmen do not believe that this DEIR addresses the major concerns that the Town of Westborough has about traffic generated, including the deterioration of level of service on Route 9-Otis Street and on local access Routes."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 30-2

"We are also concerned about safety and liability issues and the lack of mitigation. The Board believes that a station at Smith Valve Parkway will have substantial negative impact on the Town's roads and neighborhoods, yet no mitigation has been proposed by the MBTA. Noise and vibration abatements, road widening, sidewalks for school children, relocating utility lines, and the widening of railroad bridges must be addressed through mitigation proposals from the MBTA."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 30-3

"In view of the response by Town Departments and many citizens, the Board of Selectmen has voted unanimously to endorse the building of a regional station near Route. 495 and to support the undertaking and appraisal of a complete, serious feasibility study as approved in the Transportation Bond Bill **before** any local stations are constructed."

Response

See Response to Comment 1-9 and Section 3.3 of this FEIR #2. (Due to a variety of reasons and a recent non-binding vote at town meeting, it now appears that the Westborough Selectmen no longer support a Regional Station).

Comment 30-4

"We therefore request that EOEA request a project deadline extension for a regional station alternative as outlined and permitted the U Transit System Improvements (310 CMR 7.36), section 3: Project Delays and Project Deadline Extension.

The extension would apply to 310 CMR 7.36, section 2(3c)."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 30-5

"We suggest that the feasibility study weigh a regional station as compared to all five local stations in light of:

- total costs including all mitigation costs in the five towns hosting a local station
- additional ridership from Marlborough, Northborough, Shrewsbury, Upton, and Hopkinton, considering new residential and commercial growth
- traffic, safety, and liability impacts of access routes on major highways vs. through local neighborhoods
- environmental impacts, including noise, vibration, liability, and safety issues for regional and local stations, based on the five towns' comments to the DEIR."

Response

See Response to Comment 1-9 and Section 3.3 of this FEIR #2.

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 31

Westborough Police Department (2/27/95)

Comment 31-1

"I have reviewed the DRAFT Environmental Impact Report (DEIR) for the proposed Worcester Commuter Rail Extension Project and feel as I stated in 1993, that a regional station located at Route 495 and the Massachusetts Turnpike would be the most logical and common sense location for this project. Otherwise, I do not support a satellite station located in the Town of Westborough."

Response

See Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment Letter No. 32

Westborough Historical Commission (1/10/95)

Comment 32-1

"Table 7.8-1, page 7-73 errors exist in column, 'Potential Eligibility': 11 Maynard Street is not listed as an historic property and it is eligible."

Response

Update on this matter in process under a Memorandum of Agreement (MOA) with the Massachusetts Historical Commission. (See Appendix H)

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 32-2

"Table 7.8-1, page 7-73 errors exist in column, 'Potential Eligibility': 59 Fisher Street is not listed as an historic property and it is eligible."

Response

Update on this matter in process under a Memorandum of Agreement (MOA) with the Massachusetts Historical Commission.

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 32-3

"73, 79, 99, 138 & 143 Fisher Street (see attached) are documented in our Westborough Survey Forms and all potentially eligible."

Response

Update on this matter in process under a Memorandum of Agreement (MOA) with the Massachusetts Historical Commission.

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 32-4

"Environmental Impacts-Westborough Station, Paragraph 5: our listings involve more than three residences which will be subject to 'temporary construction noise impact.'"

Response

A review of the noise impact evaluation indicates that the three houses cited in the DEIR is the correct number.

Comment 32-5

"Historic Properties Sites: [Page 14-33] The statement that no architectural resources are located near the proposed Station is erroneous, see attached Survey Forms."

Response

The context of the statement was to note that the station site would have no direct impact on resources.

Comment 32-6

"Archaeological Resources: Our findings at sites: Charlestown Meadows, Hoccomocco, and Astra, all within proximity or adjacent to the Westborough MBTA Station have documented and substantiated the Middle and Archaic periods existing 3,000 to 8,000 years ago. We understand that 'Timelines' has done a survey of these area impacted; however to date, the report has not been made available to the Massachusetts Historical Commission or our Commission."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment Letter No. 33

Westborough MBTA Advisory Commission (3/3/95)

Comment 33-1

"The Westborough MBTA Advisory Committee supports the goal of increasing public transportation alternatives for Central Massachusetts resident, including commuter rail service. The Committee believes, however, that this DEIR is inadequate because it fails to adequately address several major concerns to Westborough residents"

Response

The Secretary of Environmental Affairs ruled that the DEIR was adequate. Westborough concerns will be addressed further, especially in FEIR #3.

Comment 33-2

"The Westborough MBTA Advisory Committee disagrees with the MBTA's statements concerning the likelihood of legislative reform of the MBTA district and formulas. (SECTION 6.0 SOCIO-ECONOMIC IMPACTS: 6.4 ASSESSMENTS, pages 6-7 - 6-10.) The Boston Globe reports that a legislative subcommittee of the Joint Transportation Committee has set an April 1995 deadline for developing a more equitable funding system."

Response

Further discussion and analysis of the assessment issue is not required in accordance with the DEIR certificate. See Appendix A.

Comment 33-3

"The Westborough station, projected to be used by 22 Westborough riders out a total ridership of 216 (Table 14.1-4, pg. 14-8), doesn't offer a great benefit to the town when weighted against potential costs through future MBTA assessments."

Response

Further discussion and analysis of the assessment issue is not required in accordance with the DEIR certificate. See Appendix A.

Comment 33-4

"The DEIR's statement that 'The (Westborough MBTA Advisory) Committee expressed a preference for the Smith Valve Parkway site' needs to be clarified. (SECTION 1.0 PROJECT OVERVIEW: HISTORY OF THE PROJECT, pg. 1-35.)"

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

It is understood by the MBTA that the expressed preference was made in the form of a recommendation to the Westborough Selectmen.

Comment 33-5

"A major omission in the DEIR is a failure to address planned residential and commercial developments in the study area and their impacts on ridership projections and baseline traffic levels. Please refer also cite background growth projections in the comments submitted from the Westborough Planning Board on this issue."

Response

See Response to Comments 2-5 and 14-4.

Comment 33-6

"The Draft's statement that 'Through discussions with the Town of Westborough, it was determined that no major new developments are planned within the study area by 1996' is incorrect and this information needs to be corrected and updated. The Westborough Town Planner reports that his office has not been contacted during the past 17 months regarding planned developments."

Response

See Response to Comment 14-4.

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 33-7

"The 1996 'No-Build' Traffic projections need to be revised to include several major projects are planned for the study area by 1996: The 120 unit Charlestown Meadows apartment complex on Gleason Street, the Wal-Mart project at Otis Street north of Route 9, and the Assabet Estates home development which involves construction of a new road off Fisher Street near Otis Street."

Response

See Response to Comments 2-5 and 14-4.

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 33-8

"The information concerning the proposed 'Fountainhead Plaza' project is incorrect and out of date. Permits have been obtained for construction of a Wal-Mart at that location. This project is progressing and it is reasonable to expect that it would be completed by late 1996. The Wal-Mart project needs to be included in both the 2001 and 1996 'No Build' traffic projections."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations)

Comment 33-9

"The CTPS ridership projections for the Smith Valve Parkway station fail to account for future increases in ridership due to rapid residential growth in Shrewsbury, Northborough, and Upton - the communities projected to comprise 90 percent of station ridership. The MBTA should be required to consider the high growth potential and recent home building permits in these communities when forecasting ridership and impacts."

Response

The CTPS ridership forecasting model is not a sub-area model, rather it is a regional demand model which uses regional demographic information. The demographic growth projects used in the model for the Worcester Corridor were obtain from the Central Massachusetts Regional Planning Agency which we believe accounted for the growth in Shrewsbury, Upton, and Northborough.

Comment 33-10

"In addition, the MBTA needs to consider the likelihood that commuters will move to these communities based upon their proximity to commuter rail, where no such service existed before."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.) Also see Response to Comment 13-8.

Comment 33-11

"Traffic projections need to be revised to acknowledge the use of local roads as preferred routes over Route 9 to Otis Street. The MBTA's projections that Maynard and Fisher Streets will receive only 2.8 percent of the traffic to the Westborough station are in error."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-12

"The MBTA's traffic study fails to include numbers for the Maynard/Milk Street (Route 135) intersection. The DEIR should address this intersection and proposals for traffic control should be stated in an amended report."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-13

"Arch Street is a direct access route to the proposed station. The traffic study fails to assign any station related traffic to Arch Street. The DEIR does not acknowledge the high potential for traffic and pedestrian safety impacts on this narrow, winding road."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-14

"The DEIR's assertion that the Build analysis is a 'worst case' analysis is not valid if riders use local roads (Arch, Mill, Maynard, School, Fisher, etc.) to reach the station instead of Route 9. The vehicles traveling to the station on local roads will not be double counted because they are new trips: They would not otherwise be using these residential roads in the absence of a station. Furthermore, 90 percent are projected to come from outside Westborough so they are not likely to be current users of these streets."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-15

"The CTPS projections forecasting that no rail patrons will walk to the Westborough station are incorrect because they are based upon inaccurate and incomplete information (pg. 14-39).

The nearby Fountainhead apartment complex, the 120 unit Charlestown Meadows apartment complex approved for construction on Gleason Street, and ongoing residential construction in the vicinity will provide a source of rail patrons walking to the station. The Office of the Westborough Planning Board can provide the necessary information, but the MBTA has neglected to contact them."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-16

"The Westborough MBTA Advisory Committee believes sidewalk mitigation is required for the streets where students must walk to the Fisher Street schools."

Response

(This comment will be answered in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-17

"There is not enough explanation in the DEIR to make noise impacts understandable to the average reader. The MBTA should clearly explain and elaborate on these noise impacts and present the data currently buried in the appendix in a form easily understood by a layperson."

Response

Comment noted; see Response to Comment 27-26.

Comment 33-18

"The DEIR is severely lacking in its approach to noise and vibration abatement. A comprehensive noise and vibration abatement plan is required now, and the sources of funding for such abatement, if any, must be made clear."

Response

Noise and vibration abatement options are stated in the DEIR. Where mitigation is warranted and feasible, commitments have been made in the FEIRs.

Comment 33-19

"Why are no residences considered impacted under basic service as 19 additional trains will be running? The Westborough MBTA Advisory Committee is skeptical of the DEIR's claim that the increase from 19 trains to 31 will cause 32 homes to be impacted, whereas the first 19 trains will cause no residences to be impacted."

Response

As described in Section 7.3 of the DEIR, the L_{dn} descriptor of noise environment is a 24-hour measure of the cumulative sound exposure. The level of impact is a function of the total train events during the day. Under the project noise impact criteria, the increase in noise levels resulting from Basic Service (20 trains/day) does not create a significant impact; the noise levels from Expanded Service (32 trains) would have resulted in significant impact on the 32 homes. This impact was one factor considered in the MBTA's decision to no longer propose Expanded Service as a project alternative.

Comment 33-20

"The Westborough MBTA Advisory Committee believes noise barriers are required for basic service, regardless of whether a station is constructed at Smith Valve Parkway. This

requirement for noise barriers and the sources of their funding need to be addressed before basic service comes on line."

Response

Noise impact assessment for the DEIR showed no noise impacted sites in Westborough for Basic Service. Under the temporary condition without a station in Westborough, one residence is impacted, but a noise barrier for a single residence does not meet the cost criterion established for the project.

Comment 33-21

"Under expanded service, Table 3.4-6 (pg. 3-45) states that there will be 31 trains stopping in Westborough running as late as 1:20 AM. This will add a significant level of noise, even if the commuter trains are quieter than the freight trains."

Response

Expanded service is no longer being considered as part of the project. Expanded service is not an alternative for the FEIR.

Comment 33-22

"Per table 7.3-2 (pg. 7-17), which homes are considered impacted under expanded service. The locations of these residences should be listed in the DEIR."

Response

Expanded service is no longer being considered as part of the project. Expanded service is not an alternative for the FEIR.

Comment 33-23

"Per table 7.3-3, where are the potential noise barriers of 5650 feet to be located in Westborough under expanded service?"

Response

Expanded service is no longer being considered as part of the project. With Basic Service, there is no need for the noise barriers in Westborough.

Comment 33-24

"The suggestion of 'sealing holes in exterior surfaces that might admit sound and by providing forced ventilation and air conditioning so that windows do not need to be opened' (pg. 7-20) is not acceptable as form of mitigation ."

Response

Sound insulation of a home is an option where source or path treatments are not feasible. Participation in such a program would be voluntary on the part of the homeowner.

Comment 33-25

"How will the noise level change for local residents with no Smith Valve station and only a I-495 station (i.e. faster train speeds if not stopping at Smith Valve parkway)? An accelerating train requires 1 to 1.5 miles to reach full speed from a stop. The accelerating train is noisier than one passing by at full speed."

Response

FEIR #2 presents the analysis results for no station in Westborough.

Comment 33-26

"Air quality tests should be performed for residences and near the Fisher Street schools because the Maynard Street/Fisher Street/Mill Road area will experience traffic impacts due to vehicles using these roads as shortcuts to reach the Smith Valve station."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-27

"The DEIR fails to address any mitigation for the most exposed sections of track in Westborough, namely the section of track crossing Water Street and High Street where these two roads intersect. The track in this area is open and accessible and a stone/dirt parking area abuts the track at one point. Residents park their cars in this area and at present a pop-up camper is parked next to the tracks. A large number of school aged children live in this densely populated area of town, and a trip to this area on a sunny afternoon will show that these children do play in close proximity to the tracks.

An increase in the volume of rail use caused by an expanded MBTA schedule will increase the likelihood that accidents could occur at this section of track. The MBTA should install a sight appealing fence around this 100-200 foot stretch of track to limit access and ensure the safety of residents in the area"

Response

A new 6 foot high chain link fence is proposed for this area, on both sides of the tracks, as indicated in Table 4.7-1 of the FEIR #1.

Comment 33-28

"The station platform as proposed would be within 1 to 2 feet of the property lines of homeowners on the south side of the station tracks. The tracks are elevated up to 15 feet above 99 and 101 Fisher Street. The DEIR has not addressed how to construct the 800 foot platform, which is over 21 feet from the track center, without filling or grading on these properties. This would preclude station construction without access to these properties."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-29

"Limited land availability would prohibit landscaping, sound barriers or other station improvements without encroaching upon abutting property (refer to Figure 3.2-3 pg. 3-17). Abutters are skeptical of the MBTA's claims that no property taking is required for station construction and question whether the necessary sound barriers and landscaping can be developed on the limited rail property available on the south side of the tracks."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-30

"The New England Power Company has an easement along a 70 foot wide section of 99 Fisher Street. This easement prohibits the construction of fences and allows the New England Power Company to cut back trees and other plant growth. The easement is in direct conflict with abutters' desire for sound abatement measures. The DEIR fails to even

address the existence of the power lines. These power lines must be relocated to the north side of the tracks to allow for proper noise abatement and pleasurable landscaping on the south side of the tracks."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-31

"Power lines adjacent to the station emit RF radiation, ANSI standard C95.1-1991 addresses the allowable RF radiation limits. The DEIR should provide RF measurements to assess the impact on passenger safety and determine if RF safety limits would be exceeded."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-32

"The location of the pedestrian bridge adjacent to high power transmission lines must also be addressed from both possible electrocution dangers and RF radiation hazards."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-33

"The DEIR fails to mention any plan to restrict pedestrians from crossing abutters' property or from walking or falling off the station platform onto abutters' property. The DEIR refers to a 'covered canopy about 150 feet in length' (pg. 3-17) that will prevent pedestrians from walking or falling off the platform. It is not clear whether the remaining 650 feet will have safeguards to protect passengers. With the station platform up to 15 feet above the adjacent property, severe injury could result. The issue of the abutters' liability in case of an accident must be addressed."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-34

"The DEIR does not address station security issues. Abutters have expressed concerns about the potential for problems given the remoteness of the site. This issue must be addressed by the MBTA in coordination with the Westborough Police Department."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-35

"The MBTA's mitigation policy needs to be revised to acknowledge that 'breaking it' refers to the duration and frequency of impacts (i.e. increased traffic and noise) and not merely the change in an intersection's Level of Service. For instance, the Peak Generator Hour for station bound traffic will extend the Peak Traffic Hour in both the morning and evening. Also, residents have expressed concerns regarding the increased frequency of commuter trains in addition to the noise impacts from each train."

Response

Deterioration in LOS beyond D is a common criteria utilized by EOEA and, therefore, adopted by the MBTA. Calculation of LOS considers the peak hour (i.e., worse case) conditions.

(Additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 33-36

"The DEIR does not address the costs of required off-site mitigation and how such mitigation will be funded with the 78 million project budget. The MBTA needs to address this issue now. Cost estimates for mitigation will better show the true costs of constructing the Smith Valve Parkway station and provide a more accurate cost comparison with the regional station option."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-37

"Given the impacts to noise, traffic and pedestrian safety on local roads, the lack of specific mitigation proposals in the form of sidewalks, traffic control and noise abatement is unacceptable to the Town of Westborough."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 33-38

"The 10 page 'Regional Station Analysis' is inadequate and fails to address the issues described in the scope. The Westborough MBTA Advisory Committee does NOT consider this chapter to be a 'Feasibility Study' of the regional station and the MBTA should in no way be allowed to claim it substitutes for a thorough feasibility study, as has been included in the recently enacted Transportation Bond Bill."

Response

See Response to Comment 1-9 and Section 3.3 of this FEIR #2.

Comment 33-39

"The DEIR fails to provide a cost comparison of the 5 intermediate stations with the I-495 regional station that includes the total costs of off-site mitigation for the intermediate stations. This cost comparison should be scoped in the regional station feasibility study that has been included in the recently enacted Transportation Bond Bill."

Response

See Response to Comment 1-9.

Comment 33-40

"There is no logical reason why Westborough or Southborough should be rushed into a decision on a station location by the MBTA before a regional station alternative has been thoroughly studied. A regional station would ultimately provide a wider pool of riders

than either station alone, without the negative impacts to traffic and pedestrian safety in our local neighborhoods."

Response

See Response to Comment 1-9.

Comment 33-41

"The I-495 regional station is an opportunity to create a more viable cost effective rail system benefiting not only Central Massachusetts, but providing access from the western part of the state via the Mass Pike."

Response

See Response to Comment 1-9.

Comment 33-42

"The Westborough Board of Selectmen, Southborough Board of Selectmen, regional MEPA Citizen's Advisory Committee, Westborough-Northborough Area Chamber of Commerce and the Westborough MBTA Advisory Committee all strongly support the undertaking of a thorough feasibility study of an I-495 regional station that has been included in the recently enacted Transportation Bond Bill. This study needs to be conducted now and the site for a regional station settled - prior to the construction of location station in Westborough."

Response

See Response to Comment 1-9.

Comment 33-43

"The DEIR's analysis of regional station ridership is flawed because it presupposes that all 5 intermediate stations will be constructed prior to the opening a regional station. The assumes that intermediate station ridership will merely be redistributed and this flawed analysis results in a 'not cost feasible' determination for building a regional station."

Response

See Response to Comment 1-9.

Comment 33-44

"The CTPS projection of 1290 riders for a regional station alone is low because it fails to account for additional ridership from commuters already traveling on I-495 and or the Mass Pike whose destination is Boston."

Response

Our demand model uses a mode choice model which is capable of diverting automobile trips to transit trips. The results of the mode choice model indicate that nearly 80 to 85 percent of all ridership would be due to diversion from the automobiles. Therefore, we have indeed accounted for existing I-495 and MassPike commuters who would switch modes when the new service becomes available.

Comment 33-45

"The CTPS projections fail to account for the high growth potential and recent home building permits in the I-495 corridor. Unlike the communities along the 128 corridor, the I-495 region boasts the availability of land for home building and more affordable home prices. These factors combine to make the I-495 region in the vicinity of a proposed regional station an attractive place for Boston bound commuters to live."

Response

See response to Comment 14-4.

Comment 33-46

"The Westborough MBTA Advisory Committee has requested ridership projections without Southborough and Westborough local stations. The MBTA has told the Committee that it has the capabilities now to develop this scenario as well as excluding and including any or all of the intermediate stations. These projections need to be included in the DEIR."

Response

Ridership projects without Southborough and Westborough local stations are contained in the revised CTPS ridership projections in Appendix D.

Comment Letter No. 34

People for the Ashland West Alternative/John Kelly (2/17/95)

Comment 34-1

"We, the undersigned concerned citizens, local business owners and/or abutters, are writing to express our opinion that the so-called west alternative site should be selected by the MBTA as the location for the Ashland Commuter Rail Station."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 35

Ashland Board of Selectmen (3/6/95)

Comment 35-1

"The East Alternative plan would devastate the businesses which now line Megunko Road in one of the Town's few industrial zones. This is unacceptable."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 35-2

"The design also leads us to believe that the MBTA is planning to abandon one of the Town's mandatory components for the plan: a direct access road from the station site to Route 135."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 35-3

"The Town must be a part of the decision-making process so that issues such as those expressed here can be resolved cooperatively rather than reactivity. It would be in the best interest of the MBTA to schedule, at an early date, a public meeting in Ashland so that the MBTA can discuss current developments with this Board, affected businesses and property owners, and residents of the Town."

Response

The MBTA will continue to improve upon the communications and coordinations with the town to review and discuss relative issues.

Comment Letter No. 36

Ashland MBTA Rail Committee (3/9/95)

Comment 36-1

"The DEIR and MBTA acknowledge the existence of floodplain, wetlands and sensitive areas on the proposed western alternative site. Thus this location may in fact be infeasible due to floodplain and wetlands. We believe a site redesign may potentially avoid wetlands and EPA involvement.

We suggest breaking the proposed south lot up into parcels (much like the west Natick MBTA lot). In addition, we request a reevaluation of the proposed 200 parking spaces on the north side of the tracks."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

In the meantime, various station options are being studied in cooperation with the Town and others.

Comment 36-2

"Sidewalks would be required, particularly for access across the Cordaville Road./Pleasant St. bridge and as appropriate elsewhere. The junction of Cordaville Road. and Pleasant St. is also a problematic and potentially unsafe access point for

concentrated traffic volumes into the proposed parking lot. What mitigation does MBTA propose to alleviate this?"

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 37

Ashland Town Planner/Stephen Kerlin (3/9/95)

Comment 37-1

"The problem, as I see it, in this report, is that the stations are generally located in isolated locations that can be described as 'pure park and ride stops.' There are three possible exceptions to this comment, the Worcester, Ashland, and Southborough stops. If one is to build pure park and ride stations, then we are driving automobiles to large parking lots and not improving the fabric of these communities."

Response

Stations in or near to town centers and/or population concentrations are most often considered unacceptable in terms of lack of adequate parking and adverse traffic impacts.

Comment 37-2

"What is even more distressing is that the location of these stops such as Millbury and Westborough, which are prime examples of improper sitings. In these isolated locations such as Westborough is difficult to determine who is going to be utilizing said station."

Response

Based on transit accessibility, travel times, fares, and mode attractiveness, the model is capable of determining what proportion of trips from a community would use the station. As long as a station is accessible by automobile, it will be used by some portion of the population.

Comment 37-3

"In the Millbury example, it is also difficult to determine as to why commuters west of Worcester would opt for the station as opposed to going and staying on the Turnpike."

Response

The cost of driving the automobile (gas, tolls, insurance, maintenance), downtown parking costs and traffic congestion are some of the main reasons whey people would choose a transit mode. The commuter rail in general is an attractive mode, offers a quiet and safe rider for a reasonable price.

Comment 37-4

"In addition, at the present time, the Mass. Turnpike has a number of 'park and ride' lots including a site in Auburn near their interchanges."

Response

Existing and proposed MTA park'n'ride lots have been considered in the overall transportation planning of the MTA and the MBTA. The commuter rail extension to Worcester is part of the plan to improve the traffic flow on the turnpike, especially inside Route 128.

Comment 37-5

"Next, the report does not go beyond its current role in the construction of the station and does not comprehensively examine existing and future land usage in the vicinity."

Response

The DEIR discussed induced development and land use Section 6.2.

Comment 37-6

"Nor does it go into to much detail over intermodal set-up, preferring to concentrate on the 'park and ride' set-ups."

Response

Certainly, the emphasis on commuter rail extension is to remove automobiles from the highways. Station development also does include provisions for pedestrian access and provision of bike racks to encourage alternate modes of access to the station.

Comment 37-7

"Other overall questions include the status of the regional station at I-495 and the MassPike. The report glosses over this issue because of time constraints and costs."

Response

Regarding the regional station matter, see Response to Comment 1-9.

(Additional information will be addressed in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 37-8

"Next, there is little comment on the connectivity with the State Parks at the proposed Ashland and Southborough stops. These two State Parks are in close proximity to this system and are important activity centers for the State. In other words, reverse commutes could be considered in more depth than as currently depicted in this report."

Response

(This comment will be answered in FEIR#3, Westborough, Southborough, and Ashland Stations.)

Comment 37-9

"In the opening memorandum in Appendix II, I have concern with the figures for with the numbers of riders served -- is it 3,385 or 4,500;"

Response

The numbers cited are work trips to the Boston CBD from the five towns through which the extension passes plus the towns within the project's service area. For more information on ridership, see the revised CTPS ridership projections in Appendix D.

Comment 37-10

"Is the travel model taking into account all modes of active and passive transport. How can they be sure that the work trips in 1990 are accurate and whether they can reflect potential ridership."

Response

The 1990 work trips were obtained from the 1990 U.S. Journey-to-work Census data. We assume that the Census data are accurate.

Comment 37-11

"In addition, I question the use of the model itself. As stated in a report entitled 'The Transportation/Land Use Connection' by Terry Moore and Paul Thorsnes, most metropolitan area models for transportation and land use 'lack solid economic foundations.'"

Response

The focus of this study was to approximately determine the ridership potential for a commuter rail extension to Worcester. It is true that a transportation improvement such as this would have some land use impacts in the long run which could in turn have an impact on the ridership itself. There are a few models in the country which try to address the inter-relationship between land use and transportation but they have not performed satisfactorily. CTPS is in the process of making several improvements to an existing land use/transportation model. We hope to have this model ready in about six months. For the Worcester commuter rail extension study, we could not look at these impacts because we did not have a reliable land use/transportation impact model.

Comment 37-12

"Reverse trips to Worcester for special events and the recreational trips to the State Parks as mentioned previously in this letter and other items should be elaborated in this study."

Response

Such reverse trips are not only likely, but they will be given special consideration by the MBTA.

Comment 37-13

"The Table on Proposed Railroad Vertical Clearance Improvements notes three improvements in Ashland, i.e., Howe Street, High Street, and Fountain Street. It was my previous understanding that Ashland's Fountain Street bridge is critical for movement of emergency and other vehicles in Town and that said bridge would be reconstructed in a timely fashion. This, therefore, may not require the lowering of the tracks; however, does this impact upon the progress of the commuter rail or does lowering the tracks slow down bridge reconstruction? This may also be applicable to the High Street bridge, which has a higher priority for reconstruction."

Response

(The following response was presented in the FEIR #1, Railroad Right-of-Way and Layover facility, July 1995.)

Since publication of the DEIR, it has been determined that no track lowering nor bridge raising will occur at Howe Street and Fountain Street as part of this project. It is anticipated that the High Street bridge will be replaced by the MHD in 1996.

Comment 37-14

"I do not believe that this description goes far enough as station area site plan. There should be more details and more amenities offered from a 'bare bones' station."

Response

Detailed site plans will be made available to the town for review when the design has advanced to an appropriate level.

Comment 37-15

"In addition, 'fencing will be installed between the inbound and outbound tracks,' is this being consistent with the rest of the commuter rail presently in operation?"

Response

The MBTA utilizes inter-track fence at other stations and it is a standard at new stations. The fencing channels pedestrian traffic or, in this case, restricts pedestrian access at grade.

Comment 37-16

"As for the Grafton Station and other stations, I have concern for pedestrian overpasses, train platforms, and the walking distances to the parking lots. Do these stations meet the requirements under ADA?"

Response

The MBTA has every intention of providing access for the handicapped. The MBTA has requested a variance from provisions of the Massachusetts Architectural Access Board to allow for 45 foot long raised "mini-high" platforms rather than raised platforms of 800 feet.

This shorter raised platform will allow for handicapped access while allowing for the continued primary use of the rail line for high/wide load freight operations by Conrail, the owner of the rail right-of-way. Pedestrian overpasses as well as other perhaps less obtrusive means of crossing the tracks remain under consideration and are being further studied.

Comment 37-17

"It is my contention here that the transition from the interim service to the new services should be phased in over a period of time to allow for a complete study of the different components of the travel mode and its frequency including ridership, peak hour demand, and parking requirements."

Response

The MBTA has evaluated the various elements of concern and has concluded that the transition from Interim Service to Basic Service will be made smoothly without problems.

Comment 37-18

"Next, 'if station generated traffic degrades the level of service from LOS D or better to LOS E or LOS F, corrective action will be proposed.' Does this preclude corrective actions when levels of service drop yet do not fit in the above categories?"

Response

A significant traffic impact will trigger the need for mitigation. The addition of station related traffic does not necessarily call for corrective action, i.e., some additional delay at signalized intersections and some reduction in reserve capacity at unsignalized intersections is considered acceptable.

Comment 37-19

"The study also states that 'if an existing condition revels an unacceptable LOS for an intersection or roadway segment, and the addition of station generated traffic materially worsens that condition, every reasonable effort will be made to correct the problem created by the additional burden....' A more detailed explanation on this philosophy should be forthcoming."

Response

The crux of the traffic mitigation policy which has been applied by EOEA historically is "if you break it, you fix it". Thus, for intersections operating at LOS A or B under No-

Build condition, which may operate at either LOS A, B, ro C under the Build scenario, no mitigation is necessary as the intersections have not failed. However, degradation to LOS D is significant to warrant mitigation, when 10% or more the peak hour traffic is attributable to the project. Lastly, although the MBTA will not assume total responsibility to "fix" an intersection that will operate at LOS E or F under the No-Build scenario, it is willing to share such responsibility and work with others to improve operating conditions at such intersections.

Comment 37-20

"In addition the MBTA policy 'provides for the expenditure of up to 2% of the project construction cost for noise and vibration mitigation. Consideration of the cost effectiveness of any noise mitigation measures must be weighted against the actual relief provided.' Two percent may be too limited on this matter."

Response

Cost reduced now that expanded service has been eliminated.

Two percent of the project cost was budgeted for noise mitigation for planning purposes. Should more or less money be required based on actual impacts, adjustments can be made accordingly.

Comment 37-21

"As for wetland impacts, 'the primary thrust of the right-of-way and commuter design effort will be to avoid wetland, floodplain and drainage impacts.' This needs to be examined further in light of the Wetlands Protection Act's stringent rules regarding wetland alteration."

Response

(The following response was presented in the FEIR #1, Railroad Right-of-Way and Layover facility, July 1995.)

The right-of-way improvements along the project corridor have been designed in an effort to minimize and/or avoid impacts to wetland resources. In addition, the proposed design and mitigation measures will be further examined through the Notices of Intent that have been filed with the local Conservation Commissions in each individual town.

Comment 37-22

" ... this report fails to note the current ridership for interim service and its resultant shift from the bus lines to the rails and vice versa and does not dramatically increase the overall ridership."

Response

The DEIR sought to disclose impacts when the project is fully operational. Nonetheless, a MBTA survey of the latter two of the three interim service trains from Worcester on the morning of 2/16/95 determined that about 102 took the first train about 197 the second. However, no projections of interim service ridership were developed, so projection accuracy cannot be accessed. Since that time, ridership has continued to develop and currently, daily ridership is about 450. Only about 16% is diverted from bus services.

Comment 37-23

" ... the reliance on the spur lines from Marlborough and Milford are somewhat questionable. Here, the emphasis should be placed on the direct bus routes into Boston or major proposed intermodal stations such as in Framingham Center or Logan Express area near Mass Pike."

Response

The Marlborough and Milford lines were alternatives evaluated, and discarded, in the feasibility study.

Comment 37-24

"These two grade crossings [Cherry Street and Main Street] are critical items for the future viability of the downtown area of Ashland. For instance, dropping European styled gates at the grade crossings would effectively create a 'Berlin Wall' atmosphere that would separate the downtown into two separate parts."

Response

The MBTA understands that these crossings are critical to the town. The MBTA is actively working with Conrail and other involved agencies to investigate the impacts and possible solutions.

Comment 37-25

"Consideration should be made for depressing these tracks since it is important to maintain the viability of this village center. Suggestions proposed or implied in this report for said crossings do not foster this community sense."

Response

See Section 5.3 of this FEIR #2.

(Also additional information will be provided in FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-26

"In addition, the issue of air quality needs to be justified further in light of the nature of the proposed locomotive equipment."

Response

Air quality benefits have been re-analyzed, see Section 5.1, Millbury Station - Grafton Station - Railroad Operations FEIR.

Comment 37-27

"The emphasis of this project should be to stimulate compatible land usage near the tracks to create a significant amount of density and useful commercial and industrial land uses that would service the train."

Response

Land use policy and zoning are local community issues. Also see Response to Comment 13-8.

Comment 37-28

"In addition, 'the project's line impacts on property values are likely to be negligible' according to the report. Again, this may be a very strong understatement if this project is to work correctly then property values will change appreciably."

Response

In a recent issue of the "Transportation Research Record", a study of towns on the Fitchburg commuter rail line found an average 7% increase in property values in those

towns that have a local rail station. Somewhat smaller increases are anticipated for towns without stations.

Comment 37-29

"The barrier locations along with the fences need to be examined as soon as possible, since said items are mitigation measures for nearby land uses but also have aesthetic design considerations as well."

Response

Right-of-way fencing is proposed as a public safety measure. Noise barriers are the typical mitigation to reduce noise impacts on residences. The aesthetic issue, in particular for noise barriers, will be discussed fully with those residents involved.

Comment 37-30

"Under the 'wetlands' sub-section, there is a Table on Total Project Wetland Impacts (pg. 7-57), in terms of Ashland in referencing two sites in Ashland, i.e., east and west alternates, and footnotes the fact that the western site would require filling in approximately two acres of wetlands. There is a concern here as to whether the local and state authorities would allow filling in of wetlands greater than minimal thresholds."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-31

"Under the sub-section on 'archeological resources,' there is reference to an old mill site, i.e., Aldrich mill, on the Southborough-Ashland town line and states that it is in close proximity to the Sudbury River. Further elaboration on this cultural resource is necessary."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-32

"Under the 'proposed mitigation and mitigation options' sub-section, the total length of noise barrier required to mitigate noise impact is estimated to be 1,200 linear feet for

basic service and 16,950 linear feet for expanded service.' This is quite a change between the two levels of service and should be noted in relation to fencing as previously mentioned."

Response

Expanded service is no longer proposed. For an update of noise impacts and proposed barrier mitigation, see Section 5.2 of this FEIR #2.

Comment 37-33

"The revised ridership figures prepared by the CTPS showed that the majority of the riders at an Ashland station would originate in Holliston and Ashland and travel through the center of town to reach the station. This item should be questioned since there are other abutting towns that would also utilize this station such as Marlborough and Hopkinton."

Response

Our model results indicate that majority of the ridership would come from Ashland and Holliston (about 70%). However, there would also be riders from Southborough dn Hopkinton and they have been accounted for in our calculations. In the case where Southborough Station was eliminated from the analysis, we assumed a larger market area for Ashland Station. This market area included ridership from Ashland, Holliston, Southborough, Hopkinton, Marlborough, Upton, and Westborough.

Comment 37-34

"This site becomes a 'de-facto' regional station. The Cordaville/Southville site like the Ashland site should be primarily village oriented stations that serve the neighborhood. Said stations secondarily should be intermodal in character to encourage pedestrian and bicycle traffic."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-35

"In addition, the Southborough station should be linked on an access basis with the Hopkinton State Park."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-36

"In the sub-section on 1996 traffic impacts for Southborough, Table 15.1-10 states that a number of road segment levels for peak p.m. hours, the LOS is at E level. This is disturbing and should be improved upon."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-37

"The report notes the significance of the 19th century mill village in Cordaville, yet this station is not being addressed enough with this in mind."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-38

"Also, the visual impacts [Southborough Station] should be reviewed in detail such as lighting along with the aesthetics of the fencing."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-39

"Next, although Figure 16.1-3 depicts daily and weekly traffic on a number of streets in Ashland, it fails to show the amounts of vehicles on Route 135. This volume currently is in the vicinity of at least 17,000 v.p.d. This is a major factor that should have been placed on this drawing."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-40

"In Tables 16.1-15 and 16.1-16 on road segments, the report depicts a LOS of E for Cordaville Road. This should be examined for improvements in more detail."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-41

"In addition, a proposed roadway to the site should be factored in the traffic analysis and design as well."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-42

"These disposal sites (i.e., Brownfields) should be evaluated in an overall plan in conjunction with the rail station and surrounding land uses. The sites should be cleaned in a proper manner for reuse."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-43

"In subsection 16.22 on pedestrian safety, the report states that the potential twenty walkers 'could use the existing sidewalk along the north side of Pleasant Street to reach the commuter rail station.' This is unacceptable, infrastructure improvements are necessary on this street to make the area more pedestrian oriented, specifically installation of two sidewalks in 'class a' condition."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 37-44

"The Framingham station and the impacts of new commuter rail service should be investigated in far more detail."

Response

Acting on the Notice of Project Change (11/30/95) submitted by the MBTA, the Secretary of EOEA issued a Certificate (1/10/96) which requires that Framingham traffic and parking issues be addressed under the Worcester Extension. See Section 8.0 of this FEIR #2.

Comment 37-45

"Interesting 'pedestrian levels of service drawing on page 19-3. Could such an analysis be used on other stations such as the Framingham site."

Response

Station-related pedestrian traffic at or near the Framingham Station is not of the same order of magnitude or duration as at South Station in Boston.

Comment 37-46

"Under the special procedures, the certificate mentions the level of design stages for this project. Are these correct as stated?"

Response

In general the DEIR is at the 30% design stage and FEIR's at the 60% design stage. Due to the complexity of this project, and the uncertainty of some stations, the percents may not be adhered to strictly.

Comment 37-47

"This commenter will only reiterate the need to study interim service and evaluating the phasing of increased levels of service over time."

Response

See Response to Comment 37-17.

Comment 37-48

"Next the comment regarding complete train schedules in well taken along with noting the timing of the train ride from Boston to Worcester. For example, how can the basic service take 67 minutes when the interim service takes up to 70 minutes."

Response

There are no 67 minute trips shown in the schedule, Approximate train schedules shown for Basic Service were developed using zone service during rush hour for 70 minute travel. Off-peak trains making all local stops will obviously take longer. Also see Response to Comment 29-13.

Comment 37-49

"Also, this reviewer concurs that mitigation measures should be completed prior to the opening of each station."

Response

See Draft Section 61 Findings for a detailed listing of mitigation commitments, including scheduling.

Comment 37-50

"Next, the cost recovery ratio is 64% on the current Framingham line, with the extension it drops to 42%. This needs to be explained more fully as stated by the CAC."

Response

For virtually all commuter rail lines, cost recovery ratios on commuter line segments nearer to Boston are higher because, in general, population is denser, and thus rail service patronage higher, as one approaches to Boston. Revenues per fare are smaller, but thee are many more fares, closer in to Boston. Nonetheless, the projected 42% cost recovery ratio is well in excess of the MBTA's target for commuter rail lines.

Comment 37-51

"The CAC also notes that the report does not state where the remaining 58% of the operating budget will come from, this too needs further explanation."

Response

Any part of the project's operating budget which does not come from fare revenues or other service revenues like parking fees will come from the MBTA's general revenues. A large part of general revenues comes from the legislature by annual appropriation.

Comment 37-52

"Finally, 'small towns which are already predicted to have higher ridership than...[Worcester] are understandably worried that the projections could be underestimating demand.' This should be clarified in terms of interim service and future phasing of increased levels of service."

Response

Our ridership projections were estimated based on the projected population for each town and the proposed level of peak period train service. It is incorrect to conclude our models underestimate ridership purely on the basis of comparing the current ridership at Worcester with modeled numbers. It should be remembered that our analysis always assumed some or all intermediate stations. We have not modeled the interim service at all. We believe that when the intermediate stations are built, the ridership at Worcester and other stations would be approximately in line with our estimates.

Comment 37-53

"A more thorough analysis of latent demand at Framingham station is necessary to verify this conclusion [Appendix - Volume II, Section 2.0]."

Response

Framingham traffic, parking and ridership has been included in the Worcester Commuter Rail Extension analyses. See Section 8.0, Millbury Station - Grafton Station - Railroad Operations FEIR.

Comment 37-54

"In addition, the third scenario projects 1,670 spaces in Ashland and Worcester by 2011 which is higher than the I-495 and Worcester combination. This reviewer feels this comments very disconcerting. Therefore, I strongly feel that this latent demand needs to be studied immediately and in conjunction with the final EIR." [Appendix - Volume II, Section 2.0.]

Response

The third scenario evaluated "worst case" situations in which only one of the fine proposed intermediate stations was built. The MBTA plans to construct the five stations, thus the potential parking demands of scenario three will not occur.

Comment 37-55

"In Table 3, the Ashland Station shows persons by trip origin totaling 946 for the year 2011 while transit trips in Table 2 is 523. This needs further explanation. [Appendix-Volume II, Section 2.0]"

Response

There is no inconsistency in Ashland numbers between Table 3 and Table 2 as the reviewer claims. Please note that 523 is the number of transit trips projected from Ashland where as 946 is the number of trips attracted to Ashland Station which is made up of trips originating from Ashland, Holliston, Southborough, and Hopkinton. Also see updated CTPS ridership projections in Appendix D.

Comment 37-56

"In Table 1, there is two references to Scenario 1 these need to be clarified and corrected [Appendix-Volume II, Section 2]."

Response

The table presents parking demand. The parentheticals next to scenario 1 refer to presence or lack of parking supply constraints at Southborough Station, as explained in the Appendix text.

Comment 37-57

"Noise and Vibration -- Section 3.0. In sub-section 2.1.2 on 'pure tone sources' there is concern over the different criteria on noise impact assessment between the Massachusetts DEP Noise Policy and federal guidelines in light that Conrail and Amtrack horn blowing policies. In addition, best new technology should be used to minimize noise impacts rather than current equipment."

Response

DEIR Appendix Volume II, Section 3.0, part 4.2.2.2 demonstrates that horn blowing does not violate DEP noise policy.

Comment 37-58

"With regards to the 5dBa level parameters, these measures should be evaluated as well."

Response

All proposed MBTA Worcester commuter rail noise sources were evaluated using the noise criteria for the project.

Comment 37-59

"Archaeological Survey -- Section 4.0. The historical maps of Framingham and Ashland should be replaced by more readable copies."

Response

The maps are copies from printed sources, and not originals. There is no practical means of improving the quality/readability.

Comment 37-60

"Next, reference to Lloyd's Diner in Ashland is incorrect it is in Framingham opposite Keefe Tech."

Response

The correction has been made. See Appendix H.

Comment 37-61

"Finally, I have some concern interpreting Table VIII and Figure VIII, the quality and referencing between the two should be improved."

Response

The presentation is for an archaeological sensitivity ranking which covers about 23 miles of track and surrounding areas. The intent was to identify potentially sensitive areas for further in-depth evaluation.

Comment Letter No. 38

Ashland Office of Selectmen and Town Manager (11/22/94)

Comment 38-1

"The impact on Route 135 at the intersection of the driveway entrance to the south parking facility will be significant:

a. the intersection must be signalized as a matter of public safety; and,

b. the intersection must be widened to provide turning lanes."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 38-2

"Other intersections in Ashland which are already at D or F level of service (LOS) will degrade to failure or worse with the impact of traffic from the proposed station. The applicant must be prepared to mitigate this impact. The Board is concerned that anything less will result in gridlock at certain times of the day."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Please note that the MBTA will apply its mitigation policy as appropriate.

Comment 38-3

"While not an environmental issue, per se, the Board is concerned with the negative tax revenue impact of the project. Loss of property tax revenue will result with "T" ownership of the land. Mitigating measures include adjustment of the "T" assessment and revenues from parking lot fees to offset the tax revenue loss."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 38-4

"While the Board's preference of site location is the East alternative, it feels strongly that the environmental impacts of the West alternative be thoroughly evaluated under the scope of the Final EIR."

Response

Ongoing evaluation of alternative sites should result in a clear preference for the Ashland Station site.

(Additional information will be presented in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 39

Framingham Planning Department (3/7/95)

Comment 39-1

"The DEIR estimates an increased assessment for Framingham of 0.31%. It appears to concern itself primarily with assuring Towns other than Ashland and Framingham that they will not be further assessed. Although it states that the assessment impact on Framingham is small, (pg. 6-10), the increased assessment must be measured against the negative traffic and parking impacts Framingham will experience due to additional gate closings and increased ridership from outside the Town seeking express service to and from Boston."

Response

Further discussions or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 39-2

"Since Framingham will have to allocate financial resources towards mitigation caused by the expansion, and will probably also suffer tax losses due to increased traffic and parking pressures on the Downtown, the Town feels an increased assessment is an unreasonable burden at the same time."

Response

Further discussions or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 39-3

However, it is really not feasible to estimate proposed schedules from rough calculations from the DEIR. Such estimations are inadequate for actual review and comment on the Basic or Expanded Services without reference to the proposed schedules. The FEIR should be required to supply these schedules with reference to Framingham (Re: Reverse Commute)."

Response

See Section 4.2 of this FEIR.

Comment 39-4

"In order for the Town to adequately review and comment on traffic and air quality impacts on the Downtown the FEIR should detail the times and duration of all proposed gate closings in Framingham."

Response

The times and durations of the Framingham gate closings vary from day to day, in particular for Conrail operations. Commuter trains are more predictable, with closings lasting up to 1½ minutes.

Comment 39-5

"Although the DEIR details all important station improvements, it does not state that the outbound shelter will be retained, moved and restored when the track is relocated as negotiated with Massachusetts Historical Commission. This should be stated in the DEIR."

Response

See Section 3.2 of this FEIR.

Comment 39-6

"The Town is aware that the MBTA must provide safe pedestrian passage from one side of the tracks to the other, but it would prefer that the proponent find a way to do this without resort to the massive overpasses proposed. At grade transfer points at the west

and east ends of the platforms would be cheaper to construct, more passenger time efficient, more attractive and more user-friendly than the proposed design. Two such points would encourage the purchase of tickets at the sales outlet across Waverly Street."

Response

This FEIR, in accordance with the Secretary's approval of the Notice of Project Change, will address traffic and parking at Framingham. Specifics of station design elements are being considered under the Framingham Terminal Development. The MBTA intends to keep the lines of communication open.

Comment 39-7

"The Planning Department would appreciate an early opportunity to study data developed by monitoring programs, ridership surveys and travel time studies of Route 126 prior to Interim Service, the last of which may be complete, as Interim Service commenced in the Fall of 1994."

Response

A ridership survey and detailed parking inventory survey are in process by the CTPS. The results of the surveys will be reported to the Town. Travel time studies were considered to be of limited value; delays at the intersection either side of the Route 126 grade crossing are addressed in Section 8.0 of this FEIR #2.

Comment 39-8

"The DEIR also proposes to monitor Framingham parking relative to Station Improvements in a possible and distant Phase II, but this study will be dependent on baseline studies which can only be performed at the current time. The MBTA should be required to perform baseline parking studies immediately, as well as closer to the initiation of the Station Improvement."

Response

See Response to Comment 39-7.

Comment 39-9

"The DEIR proposes to provide signage for parking at municipal parking lots and garage. This should be coordinated with a Downtown Streetscape Improvement program initiated by the Town. Additionally, this significant promise of assistance must be more completely spelled out so that the Town may adequately plan its Streetscape Improvement Program.

The MBTA should work with Town officials to develop a mutually acceptable schedule, which should then be incorporated in the FEIR."

Response

Such cooperation will be implemented in conjunction with the station improvements under the Framingham Terminal project.

Comment 39-10

"However, the DEIR presents *no* data on the impact increased service will have on these critical intersections [Bishop Street/Route 135, and Routes 126/135], or indeed, on the Downtown as a whole. The FEIR should be required to study both intersections and the Downtown with reference to increased gate closings and additional traffic due to increased ridership, with particular reference to peak hours."

Response

See Section 8.0 of this FEIR #2.

Comment 39-11

"It is interesting to note, though, that working with the data supplied in table 4.1-1, the MBTA estimates Framingham's population to grow by 1,300 persons between 1987 and 2010 and its work trips to downtown (Boston) to grow by 1,070, or only 230 more additional people than work trips. Of course this does not discuss additional work trips in the reverse direction, to Worcester, a location made more assessable to Framingham residents by the increased service, if not by proposed scheduling."

Response

The information presented in Table 4.1-1 of the DEIR was developed for the 1990 Feasibility Study (used 1980 census data) and was used to evaluate the alternatives in that Study. The communities shown include 26 of the 28 service areas communities for the Worcester Extension; the information in the table reveals that population grows much slower than work trips.

Comment 39-12

"Lastly, because the station will be moved far to the west of its present location, pedestrian access to the municipal parking garage (sited with reference to the original station location), will become much more difficult for commuters. The EIR should require the MBTA to assist the Town to negotiate with Conrail a pedestrian right-of-way over the

'wye' to connect the new platforms and the municipal garage. This should be accomplished well before the start of proposed parking improvements under Phase II."

Response

The MBTA will help coordinate meetings with Conrail to assist Framingham for better access to their garage. Since the MBTA does not have eminent domain powers other railroads, we cannot take their property.

Comment Letter No. 40

Hopkinton Office of the Selectmen (3/8/95)

Comment 40-1

"The MBTA has not addressed the potential financial impact on communities for which this rail service will be made available to commuters. Assessment issues have been an ongoing dispute between the communities and the MBTA, during the ENF stage, as documented through the Citizen Action Committees."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 40-2

"The Board of Selectmen is concerned with the proposed overpass, as being unacceptable, as it is aesthetically incompatible with the character of the neighborhood [Southborough Station]. There is a pedestrian underpass running under the tracks, which could readily be reactivated. Security issues could easily be addressed with adequate lighting, a wide tunnel, and 360 mirrors."

Response

Current studies include the probable elimination of the Southborough Station overpass.

(Additional information will be addressed in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 40-3

"The Town of Hopkinton is concerned with a proposal for a jogging trail around Cordaville Mill Pond. Half of the pond is within the Hopkinton Town bounds, and residents in Hopkinton may be adversely affected by a loss of privacy and potential loss of aesthetics in this area of the pond."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 40-4

"The MBTA has recently agreed to build some sidewalks near the proposed station. One of the goals of the Town of Hopkinton's Master Plan is to provide sidewalks from the proposed station to Hopkinton State Park. The Board of Selectmen hopes this concept will be considered in the final layout of sidewalks around or near the station."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 40-5

"Parking lots around the station will need lighting for security reasons. Since there are homes in the area, provision should be made to shield the lighting, to keep from having excessive lighting shining on the homes of the neighboring residents. Preferably, tall conifers should be used as a buffer between the parking lot and nearby homes."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 40-6

"There has been some discussion of a multi-level parking garage being built next to the station, in Southborough. The Board is concerned with the negative impact of such a structure in this rural area. We would like assurance that the such a structure will not be built."

Response

At the present time, no such parking garage is being considered.

(Additional information will be addressed in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 40-7

"We understand that the Town of Southborough has requested that a portion of the parking lot be reserved for Southborough residents. Although we may not normally support excessive parking, if the State grants this request, we believe that the Town of Hopkinton should receive the same type of benefit, due to the increased traffic and pollution which will affect our community with the building of this station."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 40-8

"It has also come to our attention that weekend service may not be implemented in the commuter rail project. We ask that this be reconsidered, so that residents in the affected towns would have an opportunity to use the commuter rail on weekends."

Response

See Response to Comment 2-35.

Comment 40-9

"Finally, the Board of Selectmen would like to ask that more emphasis be placed on the financial impact of this overall project, including alternatives such as commuter buses services, rather than the commuter rail. We question the large subsidy which will be necessary to operate the commuter rail when this service could be provided much more economically by commuter buses."

Response

Please see the Response to Comment 13-5.

Comment 40-10

"The Town of Hopkinton and neighboring communities have just been made aware of a new commuter bus service being offered by Peter Pan Bus Lines, which will stop in Hopkinton and neighboring communities and transport residents to Boston daily at a very reasonable price. Should this service be found to be successful, we believe the overall cost will be much less than for commuter rail, have much less impact on the taxpayers; both for Hopkinton and for the State. We hope this alternative will be examined more closely in the EIR stage of the process.

Response

The service alluded to, being subsidized by the MBTA, is intended to complement existing transportation services in the Worcester Rail Service area until Worcester Rail begins Basic Service at the planned intermediate stations.

Comment Letter No. 41

Hopkinton Appropriations Committee/John Woodward (3/8/95)

Comment 41-1

"Though you have to dig for it, it is extra-ordinarily obvious in the November 1994 DEIR that the Commuter Bus alternative is so vastly superior and sensible in terms of risk, cost, service, and benefit over the proposed Rail Project that any rational person would immediately select the Bus alternative over the Rail option."

Response

A bus alternative is less costly than the rail option. But, referring to the 1990 Feasibility Study and to more recent CTPS projections, it is obvious that the bus is not a real alternative since it would not attract anywhere near the ridership of the trains. See also Response to Comment 13-5.

Comment 41-2

"The DEIR evaluated a more comprehensive Commuter Bus Service Alternative, than was considered in the Feasibility Study. The performance standard for this alternative was to approximate, by means of peak hour express and off peak semi-express bus service, the commuter rail services proposed by the preferred alterative at its respective stations (pg 4-12) and assumed the same volume of patronage (pg 4-13). This Bus alternative has

tremendously smaller construction and operating impacts (particularly noise and vibration) than Rail as well as air pollution 'VOC emissions [that] are very close' (Section 5.5 Analysis Results pg 5-14)."

Response

The DEIR bus alternative was hypothetical--ridership equal to train service was simply assumed for sake of argument. The MBTA has no reason to believe that the bus alternative would, in fact, have equal ridership, and so its environmental benefits, in fact, would be much more modest.

Comment 41-3

"What's worse, I believe that corrections to or possibly a more appropriate version of the Net Annual cost comparisons will show the Rail Alternative to be even less economically favorable. In particular, depreciating various items over their potential life times (Land, Roadbed-100 years; Parking Facilities, Tracks, Bridges, Signals, Stations, Layover - 30 years; Rolling Stock - 25 years; Buses - 12 years) may be a technically proper accounting method but it does nothing to reveal the true financial impact on the Commonwealth."

Response

The MBTA's concern, particularly before MEPA, is environmental impact. It believes the preferred alternative maximizes in the service area the diversion of otherwise Boston-bound automobile drivers. A collateral concern, though, is regional equity. Worcester rail will ensure that, as traffic congestion increases over time, residents in the service area communities will be afforded roughly the same kind of access to downtown Boston already enjoyed, and to be enjoyed in the future, by residents in other MBTA commuter rail service areas.

Comment 41-4

"One of the largest portions of the actual cost to the Commonwealth will be the cost of debt service, invariably based on a 20 year term and typically for 5, 6, or 7%. So structured, the total cost of the debt service to taxpayers is, as a rule of thumb, approximately double the capital cost. The average annualized cost, therefore, is roughly 1/20 of twice the capital cost. I would urge that the actual annual cost per year to the Commonwealth be used as the cost comparison (Tables 3.6-2, -3; 4.2-1, -2). As such, the Annualized Capital Cost for Rail (Tables 3.6) is likely to be around $10 million, each and every year for 20 years, rather than the $3.3 million shown. Likewise, for Bus (Tables 4.2), the Annualized Capital Cost is probably closer to $3 million rather than the $1.6M

shown. When the actual numbers are generated, I expect Rail will become even less financially feasible to the tune of at least $5 million or maybe even $10 million, each and every year!"

Response

The annualized cost figures are not corrected for future inflation nor do they include interest. The DEIR indicated (p. 3-47) that the annual debt service to cover the project's capital costs would be about $9.7 million.

Comment 41-5

"For example, [Section] 4.1 says 'The Bus Alternative never attracts as many riders as any rail alternative.' and Table 4.1-2 lists the Daily Inbound Person Trips - Year 2010 as 1530 for the Bus Alternative. Yet 4.2 assumed 'the same volume of patronage for the commuter bus alternative.' These sections are inconsistent."

Response

Section 4-1 of the DEIR considered the bus alternative of the 1990 feasibility study. Section 4-2 of the DEIR, as the very first paragraph emphasizes, looks at "a more comprehensive commuter bus alternative. . . ." In this alternative "the same volume of patronage for the commuter bus alternative is assumed" as is assumed for Worcester Rail. DEIR, p. 4-13. Likewise, "[t]he Bus Alternative is assumed to generate the same level of demand as the commuter rail extension. . . ." DEIR, p. 5-13.

Comment 41-6

"On some technical aspects, I would like to have section 4.2's 'approximately 57 buses costing approximately $275,000 each' clearly described as to what type of bus is being considered. I assume it is a luxury coach boarding about 47 passengers, plush seating, air conditioned for summer and heated for winter with a two way radio for communication, and a single toilet compartment. Also, it might be helpful to have a dimensional comparison of seating and aisle space available on both the bus and rail."

Response

The assumption stated as to the type, size and amenities for buses is correct. The inherent size limitations on highway vehicles likely results in buses having lesser aisle width and head room than rail coaches.

Comment 41-7

"Additionally, the $1.6 million figure listed in Table 4.2-2 for Annual Operating Cost (Buses only) amounts to only $28,500 or so for each of the estimated 57 buses. Somehow that seems too low in light of the expenses for mileage, maintenance, and the bus driver's salary and benefits."

Response

The data used in the analysis are representative of actual costs for existing bus services. Also note that, for example, the salary of a bus driver would be allocated on a per trip basis, not on an annual salary. The annual operating cost is per bus, and does not necessarily represent the total annual cost of a bus driver.

Comment 41-8

"It is worth noting that the ridership of the Interim Service currently enjoys non-stop service from Worcester to Framingham and then non-stop into Boston. That has actually drawn increased ridership at the Framingham station. So much so that it has drawn the attention of the local press. The municipal parking garage across from the Registry of Motor Vehicles is now being utilized much more, even though it is 4 blocks or so from the station. It seems the type or level of service the ridership really wants is non-stop/express, or as close as possible."

Response

Increased Framingham train boardings since the institution of Interim Service in September 1994 can be attributed, for the most part, to express service from Framingham to Boston. The express trains have proven to be popular, which popularity was not unexpected. Under the proposed Basic Service, which will start in late 1996, two additional Framingham-Boston expresses will be added for a total of four express runs. The ridership and parking at Framingham Station are addressed in Section 8.0 of this FEIR #2.

Comment 41-9

"For communities further west than Framingham, the Commuter Bus Service Alternative can provide that type or level of service to a much greater extent than Rail can. And at more or less the same travel elapse time."

Response

The MBTA, based on CTPS ridership projections for the project's service area, does not consider a bus alternative as a viable alternative to commuter rail.

Comment 41-10

"At this time, it seems that the $4.75 each way MBTA Interim Service has essentially killed the $7.50 each way Peter Pan commuter bus service from Worcester to Boston."

Response

The MBTA understands that the Peter Pan service running at the time of the DEIR is still running. Other service has been added until train service starts at intermediate stations--please see the Response to Comment 41-11. The MBTA's February, 1995 survey suggests that very few Worcester Rail passengers came from the bus, but they came, instead, from automobiles.

Comment 41-11

"As some sort of compensation or mutually agreed consideration for not going to Court, the MBTA is now going to subsidize Peter Pan for new commuter bus routes from at least Westborough, Hopkinton, Holliston, and Ashland. This is what the MBTA should have done all along."

Response

The MBTA, under its agreement of March 30, 1995 with Peter Pan, will subsidize express bus service between Boston and Hopkinton-Ashland-Framingham, Holliston-Ashland-Framingham, and Shrewsbury-Westborough-Southborough until three months after the start of Worcester Rail Basic Service.

Comment 41-12

"But to do both the Bus and the Rail would split the potential ridership between the two modes of travel."

Response

The CTPS ridership projections show that only about 15% of the train commuters will come from the buses.

Comment 41-13

"The $112 million dollars in capital costs is a very tough nut to crack, even if it would be somewhat reduced with, say, 3 fewer stations to build and maybe one or two fewer train sets."

Response

The MBTA remains committed to its preferred alternative, which includes five intermediate stations. Reducing the number of intermediate stations may reduce ridership and thus increase per rider costs, but fewer stations will not provide equity of service over the whole service area.

Comment 41-14

"Maybe the best political compromise of all would be to continue service to Worcester with the Interim Service as is and provide Bus service to the other communities, at least initially. Worcester and Framingham each might continue to enjoy an Express level of service, but without any additional expense for building the intermediate stations or purchasing any additionally train sets. Maybe it would even be unnecessary for the MBTA to fund any additional rail improvements."

Response

The MBTA does not believe this alternative would meet the requirements of 310 CMR 7.36 and of the Massachusetts SIP.

Comment 41-15

"In either case, the magnitude of possible Assessments, if/when they are ever made, is likely to be significant - in the hundreds of thousands of dollars area for each community."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 41-16

"Attached is Table II-Estimate of potential MBTA Assessment at $25/Capita that was originally provided to Secretary Cox on November 19, 1993 as a comment to the withdrawn August 1993 version of the DEIR. Again, as I requested earlier, I would ask that these tables or a more recent or more official versions be placed in this section 6.4 Assessments."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 41-17

"I still do not have a lot of confidence in the estimates, especially those that project 20 years into the future, when traffic in Boston 'will be really bad.' This Rail project is ignoring the mega-trend toward working collectively from widely separate locations via electronic interconnections."

Response

Indeed, 20 years hence could include a work force somewhat different from today due to the influence of computers and related technology. Nevertheless, employing standard, state-of-the-art methodology has resulted in ridership projections which the MBTA feels confident in as justification for this extension of commuter rail service.

Comment 41-18

"I think it would be appropriate to include a 10 or 20 year vertical bar charts on the MBTA's subsidy provided by the taxpayers of the Commonwealth, the total ridership, the total fare revenue collected, the history of fare increases, and inflation."

Response

Please see the Response to Comment 13-3.

Comment 41-19

"I would request that the comments relative to the November 1994 DEIR be placed at the end of the main first volume."

Response

All comment letters received on the November 1994 DEIR and on the July 1995 FEIR are included in Appendix -Volume I of this FEIR #2 covering Millbury and Grafton Stations and Railroad Operations.

Comment 41-20

"I would ask that revisions made to the DEIR be noted with revisions bars to the left of the text or otherwise noted as alterations.

Response

The FEIR, since it will now be in three parts, is too different from the DEIR to make this approach useful.

Comment 41-21

"I would ask that all of the pages, sections, figures, drawings, tables, etc. be given unique identification, so there would be no confusion between duplicate identifications of items that exist in the various volumes. In particular, I would point out that the Appendices section at the end of the main volume and that many sections of the Appendix - Volume II do not have page numbers."

Response

All pages in this FEIR #2 are numbered such that no confusion should result.

Comment 41-22

"Similarly, I would request that the 3 volume set be numbered differently. I would suggest that the main volume be known as Volume I, and that Appendix -Volume I &II be known as Volumes II&III, respectively.:

Response

The MBTA believes the appendices are reasonably distinguished from the main volume of the DEIR.

Comment 41-23

"The Commuter Bus Alternative can clearly provide essentially the same or better service at a very small fraction of the Rail cost. In addition, Bus is not necessarily confined to being adjacent to the track bed and as such provides current and future flexibility that is impossible for Rail. Other alternatives, such as Park and Ride, Caravan, Ride Sharing, and electronic information transport are other methods that are incredibly more cost effective, if unglamourous."

Response

According to CTPS, no bus alternative draws the ridership of the preferred alternative. Commuter rail complements the other modes, all of which are essential to a balanced transportation system.

Comment Letter No. 42

Newton Department of Planning and Development (3/2/95)

Comment 42-1

"Neither document fulfills the expectations set forth by Secretaries Tierney and Coxe. Secretary Tierney asks for an alternative analysis, including the no-build alternative. In the certificate issued on 10/22/92, she says 'The analysis should include a discussion of the relative costs of the alternative modes. The environmental impacts and benefits of the various mode alternatives, such as the impacts to air quality, should be compared and discussed in this evaluation."

Response

The MBTA cannot agree that the matters complained of were not discussed. No Build is an analytic baseline, not, in this case, a real option, given the requirements of DEP and the Commonwealth's Clean Air Act State Implementation Plan.

Comment 42-2

Three of the existing 11 stations are situated in Newton. None are handicap accessible, or have any other amenities such as signs, closed shelters, or even alighting platforms on the outbound side. Outbound trains must run on the inbound track in order to let passengers off. Conrail, which controls the dispatching on this line, finds it a nuisance to coordinate with what is essentially single track service. In 1988, the first year shown in Table 1.3-3, only half of the inbound trains (7 of 14) stopped at West Newton or Auburndale. Those two stops had 35 and 26 passengers, respectively. By 1992, when all trains stop at all Newton stations, Newton is the source of almost 800 riders (daily boardings inbound only), of which almost half come from West Newton and Auburndale.

We are concerned that no one has addressed this issue. In the first 2 months of interim service, the schedule was severely disrupted. Will not basic service and full build service lead to further disruption of the schedule downstream to existing riders?"

Response

The scope of the project for extension of commuter rail from Framingham to Worcester is limited to capital improvements necessary to provide that service. While the need for improvements at the Newton stations is noted, such improvements would have to be addressed as a separate project. Basic Service operations are within the capacity of the track and signal system; some initial disruption could occur.

Comment Letter No. 43

Wellesley Board of Selectmen (1/6/95)

Comment 43-1

"There is inequity in the financing of the project through assessment against MBTA member communities and not against the communities outside the district, which are actually the beneficiaries of the proposed service. This should be remedied before a capital expenditure of this magnitude is undertaken and before the ongoing operation costs are incurred."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 43-2

"The outlying communities to be served are advertising access to commuter rail as an economic development incentive for business relocation. Since these communities do not pay for this service, the present assessment structure results in the inner 78 communities subsidizing the export of jobs and housing to outlying communities away from existing population centers and services. This encourages further sprawl conversion of open land to development and more demand for installation of costly services in outlying areas. It also makes it less possible for lower income households to pay the commute from inner city residences to these outlying areas. This philosophy is completely inconsistent with the goal of Metro Plan 2000 to concentrate jobs, housing and development near existing population centers, employment centers and public services.

Response

The concern regarding urban sprawl has been voiced by several commentors. Although commuter rail can be cited as an incentive to live in outlying communities, each community has other attractions within the bounds of available land and zoning by-laws which will attract people regardless of commuter rail availability. As such, commuter rail performs a service which answers to other goals including the requirements of 310 CMR 7.36 of the Massachusetts SIP.

Comment 43-3

"There is no analysis of the impact of the project on the ridership and usage of existing stations along the rail line, particularly the three in Wellesley.

Response

The proposed Basic Service will not affect significantly the commuter train schedule at Wellesley stations. As an extension of the Framingham Service, there will be 4 express trains from Framingham to Boston and return, but the balance of the currently scheduled trains between Framingham and Boston will be unaffected except for possible minor schedule adjustments.

Comment 43-4

"It appears there has been inadequate evaluation of the impact of changes in current Wellesley commuter rail service in terms of rescheduling of trains or any deletion of trains."

Response

See Response to Comment 43-3.

Comment 43-5

"There is no analysis of other impacts of the project on the communities east of Framingham such as changes in vehicular traffic on major streets and parking demand at stations."

Response

There is no reason to believe that ridership or traffic will be affected at stations east of Framingham. At West Natick Station, a parking structure is planned for the near future for an additional 400+ spaces. The other stations are part of the overall Commuter Rail plans for future planning.

Comment 43-6

"The Town and the Board of Selectmen are extremely concerned with safety issues along the rail line. This concern is heightened by a recent incident in which a resident was killed when hit by a train. It is believed that there will be even greater concern when additional trains are added. We believe that, as a part of this project, this concern should be addressed particularly in residential areas."

Response

The MBTA is currently addressing railroad safety through a program called "Operation Lifesaver." The program will assist the communities abutting the right-of-ways to better understand the potential dangers of train movements.

Comment Letter No. 44

Boston Redevelopment Authority (3/6/95)

Comment 44-1

"The ENF Certificate acknowledged the concern of the City of Boston that this expanded service could result in increased noise and requested an examination of the significance of the impact within Boston and the need for mitigation. However, the DEIR did not contain any analysis for Boston, but only evaluated the potential noise (and vibration) impacts in the Framingham-Worcester corridor. Furthermore, there is no analysis of the existing noise and vibration levels along the existing right-of-way to determine whether current levels are excessive and should require mitigation. We again would like to express our concern and request that this analysis be included in the Final EIR."

Response

The corridor between Framingham and Boston will be addressed in a FEIR. Existing conditions are implicitly measured as part of the FTA criteria by assessing the cumulative increase caused by the project.

Comment 44-2

"The present Yawkey Station, which provides a stop only for baseball patrons, provides a glimpse of the potential of such a station. The Longwood Medical Area Service Corporation (MASCO) has indicated a strong desire to provide shuttle service from such a station.

We therefore request that the FEIR develop a proposal for a mid-term station and evaluate the benefits and impacts of such a facility."

Response

The focus of this project has been on extending commuter service to locations west of Framingham. Thus, a new station at Kenmore Square was not considered as part of this project, although future consideration by the MBTA is not precluded by this project.

Comment 44-3

"Section 19.0 of the DEIR discusses pedestrian traffic impacts at South Station and Back Bay Station as a result of the additional passengers generated and concludes that there will not be a significant impact. Existing conditions are only generally summarized. However, there is no documentation indicating existing conditions and LOS levels nor any documentation supporting the conclusions.

Similarly, Section 19.0 also discusses approach and platform track capacity at South Station and again indicates that the proposed Worcester service would not have an adverse effect, citing an operational analysis. Again,, neither this analysis or any other supporting documentation was included.

Accordingly, we request that this information, as well as more detailed analysis, be included in the Final EIR."

Response

See Reponse to Comment 1-53.

Comment Letter No. 45

Boston Environmental Department (3/8/95)

Comment 45-1

"The Environment Department recommends that the MBTA be required to submit a Notice of Project Change if at any time the MBTA proposes to increase the number of commuter train operations on the Framingham-Boston portion of the corridor above the current daily number of 32."

Response

The MBTA will seek EOEA guidance as to need for NPC when/if this happens.

Comment 45-2

"The FEIR should include discussion of existing train noise and vibration levels, and should propose a more equitable program of mitigation focusing on corridor-wide noise levels."

Response

Existing train noise levels are discussed in the FEIR and the Appendix. Mitigation is based on the criteria stated in the FEIR.

Comment 45-3

The MBTA intends to use the proposed Federal Transit Administration (FTA) criteria for determining exposure to 'adverse noise impacts,' and hence eligibility for mitigation funding. However, the City of Boston has consistently objected to the proposed FTA criteria as unfair to urban areas, because of the sliding scale used to determine 'adverse impact.' Rural and suburban areas typically qualify for noise mitigation at much lower absolute noise levels than non-qualifying urban areas already exposed to high levels of noise."

Response

FTA criteria are more stringent for urban areas with high existing noise exposure levels than for low noise areas by decreasing the allowable increase in noise in those areas. For example, if the existing noise exposure is L_{dn} = 45 dBA, the noise exposure increase is allowed to increase 14 dBA, whereas if the existing noise exposure is L_{dn} = 65 dBA the allowable increase is only 3 dBA, and even less at higher ambient noise levels found in urban areas.

Comment 45-4

"The Environment Department recommends that the MBTA adopt a uniform performance standard of 65 $dBAL_{DN}$ for residential areas along rail corridors, and provide mitigation wherever train-related noise exceeds this level. For areas where existing noise levels exceed 65 $dBAL_{DN}$, the Environment Department recommends adopting an 'ambient+2dBA' performance standard to determine adverse noise impacts."

Response

MBTA noise criteria are in agreement with guidance from the Federal Transit Administration, the federal agency providing capital assistance for many of its projects.

Comment 45-5

"The DEIR does not include any quantitative analysis of existing conditions, or documentation to support the finding of no impact. The FEIR should provide more quantitative and verifiable pedestrian information for both Back Bay and South Stations.)"

Response

See Response to Comment 1-53.

Comment 45-6

"The FEIR should take advantage of this planning opportunity by developing a proposal for linking permanent circumferential transit service with the Worcester line. The FEIR should also investigate opportunities for linking the Worcester service with the interim circumferential bus service recently established in the area."

Response

While the MBTA does not necessarily disagree that a Kenmore connection with circumferential transit would be valuable, the place to analyze this is the circumferential transit MEPA review, since the effects of this connection from all relevant commuter rail services, not just Worcester Rail's, should be explored.

Comment Letter No. 46

Brennan F. Wall (2/17/95)

Comment 46-1

"Please take note from an environmental perspective that the Route 20 site is essentially inaccessible by bicyclists or pedestrians as due to Route 20's status as a four lane highway."

Response

The ridership projections by CTPS do not anticipate any patrons arriving at the station by other than automobile. The same is true for the Route 122 Millbury Station option, thus the station location has no influence on modal choice.

Comment 46-2

"Also please take note that the Route 122 site is in a residential neighborhood and will by its very nature, allow local citizens to walk or to bike to the station."

Response

See Response to Comment 46-1.

Comment Letter No. 47

Scott Rossiter (2/12/94)

Comment 47-1

"On page 13-15 they estimate that if a station is built only in Grafton, there will be 444 cars a day trying to park at a station with 250 spaces. There is no plan to expand the station to a regional station and no traffic studies have been done.

Response

The "Grafton Station Only" ridership and traffic analysis was performed to address the hypothetical upper limit, worst-case situation. The analysis was prompted by concern expressed by citizens from some of the communities to be served by commuter rail relative to the acceptance of local stations as proposed for the five communities between Worcester and Framingham. Since the MBTA still plans to construct all five local stations, the possibility of a regional station is no longer an issue. The Grafton Station was never considered as regional station site.

Comment Letter No. 48

Larry Gomes (2/24/95)

Comment 48-1

"The reality of the situation is that the Southborough station with its excellent access to Route. 85 and Route. 9 will become the defacto regional station the minute it comes online. I believe that both lots at Southborough will be completely full from day one, and

the overflow traffic will work its way a few miles to Ashland and fill any available space there."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 48-2

"The only way to reduce the impact on Southborough and Ashland is to provide another station location that would be attractive for the Marlborough and Hudson commuters using one of the old spur lines that run up through those towns. Another alternative might be a park and ride facility using buses to bring in passengers from Marlborough and Hudson on a schedule coordinated with the train."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 48-3

"The main benefit of this station is to the surrounding towns of Shrewsbury, Grafton, and Northborough. Since the Westborough station would be providing a service mainly for other towns, it is only fair that some sort of mitigation should be offered. At a bare minimum, side street improvements and sidewalks for Fisher Street should be provided."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 48-4

"As traffic problems in Boston worsen, commuters will be looking for alternative mass transit options. The proposed main line stations between Framingham and Worcester will only serve part of that need. Other alternatives such as commuter rail service on spur lines, bus service, park and ride lots, and HOV commuter lanes on the Turnpike should all be explored as part of a coordinated transportation plan."

Response

The MBTA feels confident that the extension of the Framingham commuter rail service will serve properly the projected ridership in the service area. The Massachusetts Turnpike Authority is planning improvements, including park'n'ride lots, that have been programmed as a compliment to the commuter rail. Bus service and other non-rail services will also compliment the rail service, but will do so at the discretion of the respective operators.

Comment Letter No. 49

Louis & Maureen Jankauskas (2/21/95)

Comment 49-1

"In summary, we believe that a small downtown station, geared to Westborough residents, is in the town's best interest and should be evaluated and proposed to the MBTA. Based on the DEIR, page ES-8, 'the MBTA will construct only intermediate stations which receive the host community's approval.' Westborough should reject the Smith Valve Station site, should recommend the downtown site, and let the MBTA decide if the downtown site is financially viable."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 49-2

"First, the station platform, as proposed, would be within 1 to 2 feet of the property line with our property and other Fisher Street residences on the south side of the station. I don't see how the station can be constructed without access to abutting properties and without filling and grading of these properties. The tracks are at points elevated approximately 15 feet above our property and the property at 101 Fisher Street. How to construct the 800 foot platform, which is over 21 feet from the track center without filling on these properties, has not been addressed. Also, with the town's 15 feet set back zoning requirement, the construction of the station does not conform to the town zoning by-laws. As an abutter, I am against any relaxation of this set back requirement. Referring to DEIR Figure 3.2-3, page 3-17, this limited land availability would prohibit landscaping, sound barriers, or other station improvements without encroaching on abutting property.

Although the MBTA has stated that no property taking is required, I am not convinced that the station can be constructed and the appropriate sound barriers and landscaping developed on the limited rail property available on the south side of the tracks."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 49-3

"Second, the New England Power company has an easement right along a 70 feet wide section of our property. This easement prohibits the construction of fences and allows the New England Power Company to cut back trees and other plant growth. This easement is in direct conflict with the desire of the abutting property owners for sound abatement measures. The DEIR never mentions the existence of the power lines in addressing the station construction. The only way to construct a station on Smith Valve with proper noise abatement for the south side homeowners and pleasurable landscaping is to relocate these power lines to the North side of the tracks. Relocation of the power lines must be a part of any Smith Valve Station baseline."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 49-4

"Based on even the basic level of service, it's clear that significant noise and vibration abatement for the Fisher Street neighborhood is required. In fact, this abatement is required even if the station is not built at Smith Valve."

Response

Projected noise impact would only occur within 25 feet of the tracks in the Fisher Street neighborhood. No homes are located within 25 feet of the tracks.

Comment 49-5

" ... the MBTA cost estimates (page 7-83) state that 'The total length of noise barrier required to mitigate noise impact is estimated to be 1,200 linear feet for basic service and 16,950 linear feet for expanded service at estimated costs of $384,000 and $5,424,000

respectively.' It's clear from these cost estimates that funding to provide sufficient noise and vibration abatement is not being allocated by the MBTA."

Response

See response to Comment 37-20.

Comment 49-6

"The DEIR did not provide any RF measurements to assess the impact on passenger safety and to assess whether RF safety limits would be exceeded. The location of the pedestrian bridge adjacent to high power transmission lines must also be addressed from both possible electrocution dangers and RF radiation hazards."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 49-7

"Another safety issue at the Smith Valve station location is the proposed 800 foot platform with a (page 14-34) 'covered canopy about 150 feet in length' as shown on page 3-17. This canopy will prevent pedestrians from walking or falling off the platform. No such protection is mentioned for the remaining 650 feet of platform."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 49-8

"The DEIR makes no mention of station security. With the present problems at the Fisher Street bridge due to the remoteness of the site and the infrequent police patrol, this area is susceptible to security problems. The proposed pedestrian bridge could easily become a gathering place and could increase security problems in the vicinity of the station. This issue must be addressed by the MBTA prior to the station construction and in coordination with the Westborough Police."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 50

Mary Fisher (2/24/95)

Comment 50-1

"Why does the station [Westborough] have to be located so close to one of the worst intersections of ROUTE 9? I go through the Otis Street and Route 9 intersection each morning. I question if the intersection could handle the additional traffic of people from Shrewsbury and Northborough."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 50-2

"I do not understand why MBTA is against a regional station located on one of the main highways of ROUTE 495 or ROUTE 9. This would provide the transportation for the surrounding towns and not cause a hardship to the Westborough residents."

Response

See Response to Comment 1-9.

Comment Letter No. 51

Mary Cullen (2/20/95)

Comment 51-1

"Although I see a growing need for train service, I see a larger need not to have it [Westborough Station] located on Smith Valve."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

At the present time, the MBTA proposes that the local station at Smith Valve Parking is part of the overall proposed project.

Comment Letter No. 52

Stephen & Charlene Henry (2/24/95)

Comment 52-1

"As TAXPAYING residents of the town of Westborough and the state of Massachusetts, we are highly opposed the building of any facility of any kind on the proposed site on Smith Valve Parkway that increases the already high noise pollution that we must endure on a daily basis from trains running in our back yards."

Response

Noise levels will be lower at this site with a station than without a station, as trains will be operating at lower speed.

Comment 52-2

"We would also like to know who is going to provide security in the neighborhood, and what is going to be done with the increasing amount of traffic?"

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 52-3

"The traffic problem at the intersections of Otis Street and Fisher Street is already a problem that has received little or no attention of the local police department. Now you are suggesting that we tax the extremely dangerous intersection with even more traffic."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 52-4

"What are the guarantees that our homes will remain safe, or are you proposing that we put that extra burden on our local law enforcement agency? May be the MBTA is proposing that we spend our tax dollars and hire more MBTA cops to sit in or backyards and protect our rights!"

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 52-5

"What about the power line that are just about in our backyards now? It is my understanding that in order to properly put it the needed lines and tracks, that these lines will have to be moved."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 53

Brian and Antoinette Kenned (3/7/95)

Comment 53-1

"We are writing you because we have a concern regarding the MBTA train station on Smith Valve property in Westborough, Massachusetts. We are not against rail service. We are concerned that the neighborhood roads are too narrow for the traffic that it will bring."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 53-2

"The DEIR does not allow for widening of the roads or providing sidewalks. This concerns us as there is already a problem with the buses running our children to and from school. This will effect both towns of Westborough and Shrewsbury. Many people already use the narrow back roads for short cuts and it will only increase with the station."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 53-3

"The best thing for Westborough would be to have a regional station at Route 495 and Route 9. These roads could handle the traffic and there wouldn't be a safety issue."

Response

See Response to Comment 1-9.

Comment Letter No. 54

Mario Avelloni (3/3/95)

Comment 54-1

"I am requesting that you support a railroad stop in Westborough on Smith Street. This in no way interferes with traffic in and out of the town of Westborough."

Response

None required.

Comment Letter No. 55

E. Thomas and Judith McCabe (3/6/95)

Comment 55-1

"The Legislature has authorized a 495 regional station study. This study should be completed before the construction of any of the 5 local stations."

Response

See Response to Comment 1-9.

Comment 55-2

"If the goal is to get 2,000 people out of their cars by 1996, then the Bus Alternative (DEIR ES 10) should be implemented. The "Park & Ride" locations in Millbury and Westborough have not been factored into or even acknowledged as part of the "short term" 1996 commitment."

Response

The CTPS ridership projections for the proposed commuter rail service are "new riders", except for approximately 15% coming from the existing bus ridership. The balance of the bus ridership should continue for those who prefer that mode.

Comment 55-3

"Interim service from Worcester now is a 60 to 70 minute ride to Boston. The Draft states it will be a 60 to 70 minute ride from Worcester to Boston including the proposed 5 intermediate stops."

Response

The approximate train schedules shown were based on zone service during peak hours. Off-peak trains making all local stops will take longer. See Response to Comment 29-13.

Comment 55-4

"The Westborough Board of Selectmen oppose any station site within the town due to unacceptable traffic patterns, but will support a 495 regional station."

Response

See Response to Comment 1-9.

Comment 55-5

"A cost comparison of regional vs. five local stations needs to be analyzed taking into consideration the mitigation costs for the five tows involved has not been defined nor has a dollar amount and where the money will come from been disclosed."

Response

See Response to Comment 1-9. If a regional station does not pass muster for a variety of reasons, the MBTA sees no point in a cost comparison vs. five local stations. Mitigation and thus mitigation costs have not been clearly defined to date, especially for the

Westborough, Southborough, and Ashland Stations. Estimated mitigation costs are included in each station cost estimate.

Comment 55-6

"There are tremendous traffic and safety impacts for the towns of Westborough and Southborough at the proposed station sites. MBTA misses entirely the local viewpoint. We want a regional station INSTEAD of local stations."

Response

See Response to Comment 1-9

(Also additional information will be addressed in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 55-7

"The 'major route' access referred to by the MBTA to the Westborough site is Route 9 and Otis Street. This intersection is LOS F. Commuters coming from Northborough and Shrewsbury will avoid this intersection and use Route 135 to Maynard and Fisher Streets."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 55-8

"The two Schools on Fisher Street have a total enrollment of 693 fifth through eight graders. Students walk from all neighborhoods in a 1½ mile radius on streets with no sidewalks."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 55-9

"Contrary to what the MBTA projects, local travel pattern to the Smith Valve site are most likely to occur over residential neighborhood street. Ref: Westborough Town Planner

comments on DEIR. These streets are narrow winding roads bordered by stone walls and massive trees. Arch and Maynard Streets narrow to 1½ lanes under railroad bridges that the MBTA has looked at and will not consider widening."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 55-10

"The Draft fails to acknowledge Westborough's planned projects on Route 9 and growth in housing and commercial development nor has the Town Planner been contacted. Access to the proposed Smith Valve Parkway site will have a serious impact on the neighborhood streets of Arch, Gleason, Maynard, School, Church, Fisher, and Mill Road."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 56

Sally Tajiani (3/5/95)

Comment 56-1

"A number of editorials in our local Westborough paper have prompted me to write this letter. The editorials urge residents to support the regional MBTA station and to oppose a local station. I am in favor of local stations as originally proposed."

Response

See Response to Comment 1-9.

Comment Letter No. 57

Janice and Alan Silvestry (3/5/95)

Comment 57-1

"As residents of Maynard Street, Westborough, we are disturbed by the impact the proposed Smith Valve Station would have on the surrounding neighborhood. The DRAFT Environmental Impact Report for the Worcester Commuter Rail Extension Project fails to address the effect increased traffic would have in a heavily populated area where two schools are located. We are very concerned for the safety of children and adults alike as they walk along these streets.

We are very much in favor or a regional station at Routes 495 and 9. Westborough would benefit from such a project without compromising the safety of its residents."

Response

See Response to Comment 1-9.

(Also additional information will be addressed in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 58

Rosemary Johnson (3/6/95)

Comment 58-1

"I am in favor of the commuter line stop here in Westborough, either at the Otis Street area, or downtown at the old railroad stop. There are complex issues involved which must be resolved. Some of these are town traffic patterns and financial assessment."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 59

Diane Power (3/6/95)

Comment 59-1

"I am writing in support of a local commuter rail station which will stop for passengers at the proposed Smith Valve site in Westborough."

Response

None required.

Comment Letter No. 60

Dennis Cox (3/8/95)

Comment 60-1

"The DEIR fails to adequately address the basic issues of site construction, noise and vibration abatement, safety, liability, and security for Smith Valve Station and the Town of Westborough."

Response

Noise and vibration assessment is conducted in DEIR according to methods recommended and approved by the Federal Transit Administration. Abatement measures are included in the FEIR.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 61

Jacqueline and David Cox (3/8/95)

Comment 61-1

"Rail Extension Project. The DEIR fails to adequately address the basic issues of site construction, noise and vibration abatement, safety, liability, and security for Smith Valve Station and the Town of Westborough."

Response

See Response to Comment 60-1.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 62

Robert Brais, Barbara Brais, Marie Brais (3/5/95)

Comment 62-1

"We would like to register our opposition to the Smith Valve site for a Westborough train station."

Response

None required.

Comment 62-2

"It is our considered opinion that several of the access roads to that site (Smith Valve in Westborough) cannot carry the traffic that would be generated by a facility of the size intended. Several of the streets are narrow and have no sidewalks, and we feel that public safety would be endangered."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 62-3

"While we feel that train service would be an advantage to the citizens and businesses of Westborough, it would be best to construct a Regional Station at Routes 495 and 9."

Response

See Response to Comment 1-9.

Comment Letter No. 63

Dorothea MacLeod (3/6/95)

Comment 63-1

"If we must have a MBTA station in town, please put it on 495."

Response

See Response to Comment 1-9.

Comment Letter No. 64

Marvin Silver (3/7/95)

Comment 64-1

"The MBTA has been unable to guaranty to the Town of Westborough that it will not be the subject of financial assessments in the future."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment 64-2

"Motorists traveling from Northborough and Shrewsbury would clog Westborough roads as they attempt to reach the station. Increased traffic would obviously present added danger, especially to children who must walk to either the Middle School on Fisher Street or the Armstrong School on West Street. Many neighborhoods in Westborough lack sidewalks and traffic increases would likely pose significant dangers to the walking public."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 64-3

"I would urge the MBTA to further study the situation and present a plan for one regional station (perhaps closer to Route 495) which would draw more riders to one location which could accommodate it, and keep traffic off local roads."

Response

See Response to Comment 1-9.

(Also additional information will be addressed in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 65

Barbara Reismann (3/7/95)

Comment 65-1

"I am writing about the proposed MBTA train station in Westborough. I strongly support the decision to build a commuter rail station in Westborough as well as in other neighboring communities."

Response

None required.

Comment Letter No. 66

William and Mary Anne Coveney (3/6/95)

Comment 66-1

"We are writing in regard to the Draft Environmental Impact Report EOEA #9154 (DEIR) for the Worcester Commuter Rail Extension Project. We insist that you reconsider the proposed site at the Smith Valve Parkway."

Response

See Response to Comment 1-9.

(Also additional information to be addressed in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 66-2

"This station (local Westborough Station) will bring increased traffic to Fisher Street. This already populated area is host to another development of new homes (the Assabet Estates). Fisher Street is host to numerous bus stops as well as children walking to the Armstrong School as well as the Sarah Gibbons Middle School. The sidewalks as they exist are dangerous and poorly maintained. An appropriation for $30,000 worth of improvements to the sidewalks on Fisher Street is among the articles coming up at the next town meeting, as of this writing the town's Finance Committee has still made no recommendation on this appropriation. If these sidewalks, that are already hazardous for our children are not improved, and traffic flow increased, the next fatality on Fisher Street, could be one of our children (an adult was killed on Fisher Street in 1994)."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 66-3

"We respectfully request that the downtown site at Fruit Street be re-evaluated. With an existing train station already present, it would seem an ideal location. This station would not have as great an impact on residences. Another site we respectfully ask you to consider would be the proposed site at the junction of Routes 495 & 9."

Response

See Response to Comment 1-9.

(Also additional information to be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 67

Jane and Richard Dunphy (3/4/95)

Comment 67-1

"Just a quick note to let you know that we would very much like to see a train stop on Smith Valve in Westborough."

Response

None required.

Comment Letter No. 68

Joseph Orlando (2/20/95)

Comment 68-1

"I think that siting the train station on Smith Valve Parkway is a very poor choice for the town of Westborough."

Response

None required.

Comment 68-2

"I believe that a feasibility report should be for a regional site near "495", this would be more advantages to all the towns."

Response

See Response to Comment 1-9.

Comment Letter No. 69

Elizabeth Colbert (2/22/95)

Comment 69-1

"What is the benefit to Westborough, since it's projected only 22 residents will use the train?"

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 69-2

"The air quality benefits don't seem to be very great given the number of commuters likely to use the new line, and the number who will be diverted from the bus service. What about the decrease in air equality for abutters to the tracks with the increase in the number of trains running, and increase car traffic through our streets?"

Response

Air quality benefits are documented in Section 5.1 of this FEIR #2. Localized air quality analysis were presented in Section 14.2 of the DEIR for the anticipated worst-case intersection. All other local intersections would also show little difference (if any) in air quality for the build versus the no-build scenario.

Comment 69-3

"Where are the 32 homes in Westborough that will be affected by noise according to table 7.3-3?"

Response

DEIR Table 7.3-3 gave a summary of the number of residences impacted and the extent of noise barrier needed for mitigation of Expanded Service, which is no longer considered an option.

Comment 69-4

"Where would the 5650 feet of potential noise barriers be per table 7.3-3?"

Response

The noise barriers described in Table 7.3-3 are not needed for the Basic Service proposed by the MBTA.

Comment 69-5

"Sealing any holes in exterior surfaces... and by providing forced ventilation and air conditioning so that windows do not need to be opened (p.7-20 to avoid disturbance from the noise IS NOT ACCEPTABLE."

Response

Sound insulation of a home is an option where source or path treatments are not feasible. Participation in such a program would be voluntary on the part of the homeowner.

Comment 69-6

"There is not enough explanation in the draft to make noise impacts understandable to the average reader. The MBTA should clearly explain & elaborate these noise impacts."

Response

The noise assessment method is further discussed in Appendix and in this FEIR #2.

Comment 69-7

"I request the MBTA be required to place noise barriers along the tracks in Westborough, regardless of the siting of a station here."

Response

The need for noise mitigation is based on severity of impact determined by a technical analysis. Implementation of mitigation is based on its cost effectiveness. The noise analyses did not identify any noise impacts in Westborough and no mitigation is required.

Comment 69-8

"Page 14-10 states those who would drive to the station are "already on the road", however, those going to Boston would have no reason to travel to Maynard St., they would get directly onto Route. 9 East."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 69-9

"Per p.6-3 "The projects's line impacts on property values are likely to be negligible. I feel my neighborhood will be adversely affected by a decrease in air quality, increase in noise from the 31 additional commuter trains, and an increase in car traffic. I had my home on the market Oct. 93 - Jan. 94. I did not receive any offers, and was told the only reason was the possibility of the Smith Valve train site."

Response

See Response to Comment 37-38.

Comment 69-10

"I would like further explanation for the cost and benefit of this project: further studies on air quality for abutters, especially the affect of diesel fumes on small children (Westborough's Middle School is on Fisher St.. which abuts the tracks); noise barriers for Maynard, Arch, Fisher. and Water Streets; sidewalks and restrictive signage for these same roads plus Mill Road.

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 69-11

"More details on the possible assessment to our town."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment Letter No. 70

Joseph Harrington (2/14/95)

Comment 70-1

"I do not favor the proposed Westborough station. I believe that a regional station at I-495 would have reduced local impacts, and eliminate the need for the currently proposed Southborough and Westborough Stations."

Response

See Response to Comment 1-9.

Comment 70-2

"In Section 17 of the DEIR I found comparisons of various locations for a regional station but no clear comparison of the regional station as a substitute for the Southborough and Westborough Stations.)"

Response

See Response to Comment 1-9.

Comment Letter No. 71

Mrs. Paul Smith (3/21/95)

Comment 71-1

"My backyard goes down to the railroad track and I am greatly against the pollution and noise of trains stopping and starting in the back of my property" (re: local Westborough Station).

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 72

Helen and Bill Panas (2/17/95)

Comment 72-1

"We are resident of Maynard St. which is located near the proposed Smith Valve station site in Westborough. Let us say first that we are not opposed to the idea of MBTA service from Westborough to Boston. Our main concern is with the Smith Valve site and is focused on the safety of our children and the children of other families in this neighborhood as they walk to schools on Fisher St. at the very time that commuters are rushing for their trains. We do support the idea of a regional station accessible through major thoroughfares in the Route 495/90 area."

Response

See Response to Comment 1-9.

(Also additional information to be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-2

"The MBTA's estimate of the number of cars using Maynard is unrealistically low. They choose to downplay the importance of this street in providing a back access to Smith Valve for traffic coming from Northborough. Instead they feel that the State's proposed improvements to the Otis Street/Route 9 intersection will make that an attractive route to the station."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-3

"The MBTA's estimate of the number of cars using Fisher St. is unrealistically low. Anyone who knows the area would prefer to take Milk St. and Fisher St. from the rotary to Smith Valve rather than Mill Road."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-4

"Maynard St. and Mill Road are narrow winding roads and have no sidewalks, Fisher St. has poor and spotty sidewalks. Our children and the other neighborhood children use these streets to walk to and from school. Our "Level of Service" may be excellent but our children are at an increased risk from the new traffic generated by the MBTA station."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-5

"The MBTA, in what only can be considered an attempt at injecting some humor into an otherwise very dry document, offers to put signs on Fisher St. "to discourage station bound traffic from using the section of Fisher St. adjacent to the School" (pg. 14-41). Do they seriously think that signs would keep the daily drivers from finding the most expeditious route to the station?"

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-6

"Almost as an afterthought the MBTA addresses pedestrian safety on pg. 14-39 and then only for their ridership who walk to the station (which their projections forecast to be none), by offering to work with the town to provide sidewalks "on Otis St. and possibly other sidewalks on nearby streets which would carry station oriented traffic." This again misses the point about safety of the non-station oriented school children who must cross the streets and walk along the shoulders."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-7

"We request that you insist that the MBTA consider a more realistic impact of ridership traffic on the Fisher St./Maynard St./Mill Road neighborhood and follow your instructions to discourage the use of these streets by providing some meaningful solutions to the safety problems they will be causing."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 72-8

"We also request that serious consideration be given to a regional station in the Route 495 area to alleviate the impact of the Smith Valve and other local sites."

Response

See Response to Comment 1-9.

Comment Letter No. 73

William Murphy (2/8/95)

Comment 73-1

"My comment on the proposed railroad station in Westborough is that sufficient study time and money has been spent and it is time to implement the MBTA proposal. The "T" has chosen a site remote from homes and adjacent to a major highway."

Response

None required.

Comment Letter No. 74

Jennifer Speed (3/7/95)

Comment 74-1

"I do not believe the study which says that traffic will not be greatly impacted in the area of Fisher, Mill, and Maynard Streets. These are residential streets with two elementary schools in the areas. Any traffic increase will have a negative impact in such a neighborhood."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 74-2

"The potential for a regional station at the intersection of Routes 9 and 495 has been too quickly dismissed. With Route 30, the Massachusetts Turnpike, and several industrial parks nearby, a station in this location could be a valuable transportation hub."

Response

See Response to Comment 1-9.

Comment 74-3

"Lastly, it is not fair to expect residents to welcome the station anywhere in town until we know the assessment formula to be used."

Response

Further discussion or analysis of the assessment issue is not required in accordance with the DEIR Certificate. See Appendix A.

Comment Letter No. 75

Bruce Johnson (3/6/95)

Comment 75-1

"I have reviewed the above referenced Draft Environmental Impact Report and would like to express my support for the planned expansion of the Worcester Commuter Rail. In particular, I support the inclusion of a station on Smith Valve Parkway in Westborough."

Response

None required.

Comment Letter No. 76

Cheryl and Paul Crivello (2/28/95)

Comment 76-1

"It is our sincere hope that the Westborough station is NOT placed on Smith Valve Parkway. If a station is necessary in Westborough, we feel that the Route 9/90/495 corridor makes more sense with regard to commuter convenience and potential impact on surrounding areas."

Response

See Response to Comment 1-9.

Comment Letter No. 77

Susan Stager (2/26/95)

Comment 77-1

"I am writing to express my support of the amendment included in the transportation bill which states that the MBTA will do a feasibility study of a regional rail station on #495, in preference to the establishment of a rail station on Smith Parkway in Westborough."

Response

See Response to Comment 1-9.

Comment 77-2

"I oppose the establishment of a local rail station on Smith Parkway. The simple fact that there is sufficient land there that can be acquired fairly easily and fairly economically does not make that an appropriate site for a station. The fact is outweighed by the profound negative effects a station would have on our street and other streets radiating in all directions from that location through neighborhoods similar to ours in Westborough and Shrewsbury."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 77-3

"Every increase in traffic makes the street (Arch Street) less safe for all of us. In my opinion the safety, the sanctity of local neighborhoods should be the foremost consideration."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 77-4

"A regional station on Route 495 will accomplish the legitimate purposes of increasing public transportation. The car traffic generated by that station will be dispersed over many more major routes and will not adversely impact neighborhoods. I ask that you support that better alternative for the commuter rail extension."

Response

See Response to Comment 1-9.

Comment Letter No. 78

Ellen Gugel (1/19/95)

Comment 78-1

"Given the current controversy over a commuter rail stop in our town, I wish to write in strong favor of the proposal. I support the Fisher St./Arch St. stop. Most notably, I also write as a neighbor of the stop (84 Fisher). Actually, I don't' care where the stop is, just as long as Westborough gets one. I also support the Route 495 regional stop, if this is the compromise it takes to make the trains stop in Westborough."

Response

None required.

Comment Letter No. 79

Barbara Sullivan and Fran Lynch (1/29/95)

Comment 79-1

"I would like to go on record as preferring a regional station to a local station on Smith Valve Parkway."

Response

None required. Also see Response to Comment 1-9.

Comment Letter No. 80

Richard Fournier, Jr. (3/5/95)

Comment 80-1

"I am a resident of Southborough and commute daily into Boston. I often take the commuter rail from Framingham and I am strongly in favor of a commuter rail station in Southborough."

Response

None required.

Comment 80-2

"I would hope the station could be used for reverse commuting and week-end service as well as daily commuting."

Response

See Response to Comment 2-35.

Comment 80-3

"I would hope the MBTA will do everything possible to mitigate the impact of the station on the surrounding area."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 81

James Knowles (2/23/95)

Comment 81-1

"I am a resident of Southborough and live within ½ mile of the proposed station. I cannot conceive of any adverse affects of locating this station along what is already a busy state highway in an underutilized commercial district."

Response

None required.

Comment Letter No. 82

Peter Venuto (2/23/95)

Comment 82-1

"I am writing this letter in support of the proposed commuter rail station to be located near the intersection of Route 85 and Cordaville Road on the Southborough - Hopkinton Line."

Response

None required

Comment Letter No. 83

Patricia Pirozzi (2/14/95)

Comment 83-1

"I am a resident of Southborough and live near the proposed EOEA 9154 Worcester Commuter Rail Extension. I am writing to let you know that I strongly support building the proposed railroad station at this site and think it will have many positive effects on the community."

Response

None required.

Comment Letter No. 84

James Waddell (2/14/95)

Comment 84-1

"I am a resident of Southborough and live near the proposed EOEA 9154 Worcester Commuter Rail Extension. I am writing to let you know that I strongly support building the proposed railroad station at this site and think it will have many positive effects on the community."

Response

None required.

Comment Letter No. 85

Russell Fustino (10/4/95)

Comment 85-1

"I would like to commend the Selectmen who publicly stated their safety concerns and the benefits regarding potential closure of the Route 9/Woodland Road crossover at the 9/27/94 Selectmen meeting. I am disappointed however, at yet another delay in the decision making process for the closing of that intersection; this time for MBTA impact analysis. Road safety minded residents have had to endure 6 delays over the past 2 ½ years. The evidence continues to mount, as time passes by, justify closing the median."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 86

Jane Fedorowicz and Michael Golibersuch (2/8/95)

Comment 86-1

"We would like to express our support for the proposed train stop in Southborough which is part of the EOEA 9154 Worcester Commuter Rail Extension. We have only recently moved to this community, and the accessibility of public transportation to Boston and Worcester was a positive factor in our choice of neighborhood. We now live within a half mile of the proposed train station and see no problems, only benefits, with its eventual location."

Response

None required.

Comment Letter No. 87

Anne Huff (1/8/95)

Comment 87-1

"As a resident of the Town of Southborough, I would like you to know that I'm very much in favor of the MBTA Station in my Town."

Response

None required

Comment Letter No. 88

Judith and Thomas Little (2/2/95)

Comment 88-1

"We are thoroughly against the building of a station in our town, most especially in the proposed location, and think that the increased pollution, noise, traffic, and parking problems will bring quite a threat to our life as it stands now."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 89

Burnam's Supper House/Daniel Giargiari (3/3/95)

Comment 89-1

"Throughout this process, I have let it be known that the opportunity for a public/private partnership between the MBTA and our restaurant would be a very positive step for both entities. Having been privy to the concerns of all parties involved in this local project, I am confident that the Ashland West Alternative would become a mecca for reverse ridership. However, I do have a number of concerns about the potential insensitivities of

state agencies. Matters of design, shared parking, easements, land transfer, monetary compensation and protection from future land taking must be addressed."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 89-2

"With several reservations, I am offering a 'best way' approach for the north side of this alternative.

The property to the east of our establishment is currently for sale. This parcel should be utilized for that reason. If more property is needed for the project, and ours is considered, then naturally it should be taken from an east to west direction."

Response

Ongoing studies and coordination with the Town of Ashland regarding the site of a commuter station are in process.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 89-3

"The issue of intersection failure at High St., Pleasant St., and Cordaville Road would be less problematic if the entrances and egresses are kept as far away from the intersection as possible. This would eliminate crossover traffic at the intersection."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 89-4

"The section of property that we intend to retain must be permitted to occupy and operate according to the plans which have been offered to the town. This area does not include any parking and, therefore, it would be necessary to dovetail our parking needs with the MBTA's."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 90

Nelson Holden (3/6/95)

Comment 90-1

"I am vehemently opposed to so called (Ashland) "East Site" for the following reasons. 14 Businesses and Residents that will be put out of business from Site East usage."

Response

Ongoing studies and coordination with the Town of Ashland regarding the site of a commuter station are in process.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 90-2

"My business as well as 2 others cannot be displaced to another part of town. Zoning will prohibit this."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 90-3

"Also I am upset and feel disenfranchised because I and we were never informed of anything going on."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 90-4

"I have never yet been able to get or see a plan of East and West sites though I tried the board said "We did not realize how many businesses would be affected by the proposed "East Site."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 90-5

"West Site" has substantially less impact on Residents, buildings, Old age Homes, and the like. Land Owners of "West Site are amenable to the land taking. It would cost less and be a benefit to the town, not a determent as in "East Site" location."

Response

Ongoing studies and coordination with the Town of Ashland regarding the site of a commuter station are in process.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 91

Claudia Lefter for Nelson and Martha Holden (2/8/95)

Comment 91-1

"My family owns land which is currently being considered by the MBTA for rail station (located at the Eastern Location). As of the writing of this letter, our family has not been notified by anyone associated with this project that our land was under consideration. In fact, we found out from a friend on Monday, February 6, 1995. Just 3 days ago!"

Response

Ongoing studies and coordination with the Town of Ashland regarding the site of a commuter station are in process.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 92

Citizens Lefter, Leacu, Camille, Holden (3/7/95)

Comment 92-1

"The Megunko Road parking lot will severely impact and/or eliminate fourteen existing businesses. Most of these fourteen businesses service the local Ashland area. Therefore, the proposed East Location would essentially put most of these companies out of business. This action would then reflect negatively on the downtown area merchants from whom these businesses purchase supplies, food, and other services."

Response

Ongoing studies and coordination with the Town of Ashland regarding the site of a commuter station are in process.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-2

"There are dozens of residential homes on the north side of the railroad tracks form Megunko Road. The maps provided in the draft EIR do not show the homes on the east end of Pleasant Street, nor the small streets of Forest Avenue, Metcalf Avenue, or Tilton Avenue. I spoke to many residents of this area and they, also were not notified that this proposed railroad station was being considered so close to their homes."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-3

"On February 27, 1995, we attended a local Rail Committee Meeting at the Town Hall in Ashland. We were told that the committee only received updated plans for the "East

Location", when the draft EIR states several times that both "East and "West will be thoroughly investigated."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-4

"The landowners directly affected by the "East Location" parking lots, and the abutting residential homes were never formally notified that this land/area was being proposed for a rail site."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-5

"The "East" location is approximately 1/10 mile from the intersection of Cherry Street and Park Road, and approximately 2/10 mile from the Main Street RR crossing. Within these two locations there are two elderly housing complexes. The Ashland Board of Selectmen are vigorously pursing Conrail to find ways to reduce the existing train noise that currently have a negative impact on the elderly residential homes. (These homes stand adjacent to the railroad tracks). To add a MBTA rail station so close in proximity to these housing units will only Intensify the current embittered situation."

Response

Noise mitigation for potentially impacted locations is discussed in the FEIR.

(Also additional information to be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-6

"The East location station will be very close to the Cherry Street and Main Street railroad crossings. The closeness may further obstruct heavy rush hour traffic by the mere fact the MBTA trains (heading west) will begin to slow as they approach the "East" location."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-7

"Also a fire station sits north of the railroad tracks adjacent to the Main Street railroad crossing. The less time the railroad crossing gates are down the safer the town, in general."

Response

The MBTA remains committed to assisting the Town in alleviating additional traffic congestion that will result from the added number of gate closings due to Basic Service. This mitigation will be developed and described in the next FEIR, for Westborough, Southborough, and Ashland Stations.

Comment 92-8

"The "East" location negatively impacts more individual people than the "West" Location. The West location will take no businesses and will not directly affect any residential homes."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-9

"No official notification to any landowners on Megunko Road or to abutters to East location. Most found out early February 1995. We believe we have been denied due process. We have not had the opportunity to attend all local MBTA rail committee, Board of Selectmen, CAC meetings associated with this proposed location."

Response

It is not the practice of the MBTA to notify land owners potentially affected by any proposal in the early planning stages. When alternatives are being considered, the selection of the preferred alternate would trigger communications with individual land owners. The MBTA continues to interact with the town officials, the local rail committee and the Citizens Advisory Committee (CAC) in what we consider an open process.

Comment 92-10

"Chapter 3, page 32, East Location. "The site lies in an industrial areas, portions of which are currently occupied by small businesses. Comment: Not vacant, all land is occupied by small businesses."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-11

"Chapter 11, page 15, (para. 2), East Location. "three industrial parcels. Comment: We are existing "business Properties", too!"

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-12

"Chapter 16, page 1, West Location. "pending environmental (Nyanza) issues, Ashland station East is also be evaluated. Comment: Why were updated maps only sent of East Location to local MBTA Rail Committee (presented at their meeting on February 15, 1995), when two out of three sections above spoke of further evaluation of West Location?"

Response

Final location of an Ashland Station is still unresolved. Discussions and coordination with the town will continue up to and including the FEIR #3.

(Also additional information to be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-13

"Chapter 16, page 1, East Location, Megunko Road parking lot abuts Nyanza Superfund. Comment: East Location within Nyanza Superfund site."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-14

"Chapter 16, page 4, East Location. "total of 18 residential buildings were found to be within noise impact distance. Comment: First, they are homes not buildings. I know of no other railroad station that abuts residential neighborhoods. None of these people have been properly notified. What kind of noise?"

Response

A total of 12 residential buildings were found to be impacted in Ashland under the Expanded Service plan; however, none are impacted under the Basic Service plan being adopted by MBTA.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 92-15

"Chapter 16, page 47, East Location. "Phase II is currently underway and includes the extraction and treatment of groundwater. Comment: This has not been constructed yet. Refers to the groundwater remediation of Nyanza's plume. Phase III, excavation of "eastern wetland" has not begun yet (Nyanza Superfund site)."

Response

An update of the Phase II and Phase II cleanup will be in the FEIR #3.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 93

Ellen Giargiari (2/28/95)

Comment 93-1

"I am saying I am pleading with you not to allow the MBTA Stations on the proposed site" Ashland Station."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 94

John Woodward (1/6/95)

Comment 94-1

"The is to say that the Rail version would be a $10.3 million cost/deficit each year whereas the Commuter Bus Alternative would operate at a $1.7 million profit/surplus every year to the benefit of the Commonwealth/MBTA. The capital cost for the Rail Extension Project so called preferred alternative is $112 million (Table 3.6-1 pg. 3-49) versus the Bus Alternative at $28.4 million (Table 4.2 pg 4-14)."

Response

Please see Response to Comment 13-5.

Comment 94-2

"How can any sane person with their wits about them pretend that Rail should be selected or that any further time, money, effort or thought should be given to it?"

Response

Please see Responses to Comment 13-5 and to Comment 41-3.

Comment Letter No. 95

Andrew and Teresa Boyce (2/2/95)

Comment 95-1

"The MBTA has yet to show that this project results in a significant reduction in air pollution."

Response

Please refer to Section 5.1 of this FEIR #2.

Comment 95-2

"The proposed pedestrian overpass [Southborough Station] is unacceptable as it is aesthetically incompatible with the character of the neighborhood. The light spillover from this ugly 30 foot high concrete and steel structure is maximum. There is already a pedestrian underpass running under the tacks which could easily be reactivated. Security issues could easily be addressed with adequate lighting, a wide tunnel and 360 degree mirrors. The light spillover from a tunnel would be minimum".

Response

The MBTA is still evaluating the most effective means for providing an unobstructed continuous path of travel to connect the station platforms and parking areas designated for use by handicapped persons. One alternative that has been studied is the pedestrian overpass , but recent studies of the proposed Route 85 railroad bridge replacement include a wider sidewalk on the west side of River Street which would connect to the station platforms by ramps and stairs.

(Also additional information to be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-3

"In addition, the design of the ramps forces a person in a wheelchair to traverse 360 feet of ramp in order to cross 14 feet of track."

Response

See Response to Comment 95-2.

(Also additional information to be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-4

"It is the MBTA stated policy that for security reasons they will not build underpasses. It seems ironic that the MBTA has insisted that no neighbors should be concerned for their security, yet they insist on maintaining this policy."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-5

"Southborough has mentioned building a jogging track around the Cordaville Mill Pond. More than half of the pond is within the Hopkinton town border. This would require the taking of a section of our property (unless they build the track on stilts) as well as the construction of two bridges over the river."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-6

"Hopkinton resident will suffer the same noise, air and light pollution, as well as traffic, privacy and security issues. Any steps at mitigation must include the residents of Cedar and Lincoln Streets."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-7

"Because the MBTA will be purchasing the Mill Pond, Hopkinton should never have been excluded from representation on the CAC Hopkinton's one non-voting member, as a resident of Fruit St., can not be considered impartial. Fruit Street is a candidate for the alternative Regional Station."

Response

The Secretary of the EOEA issued a revised CAC membership roster on January 10, 1996. (See Appendix A.) The Town of Hopkinton now has three official members on the CAC.

Comment 95-8

"We are concerned that reconstruction of the Conrail bridge and Route. 85/Southville Road intersection will either lower the road or raise the tracks. This would allow large truck traffic to pass through which would normally have used Route. 495."

Response

The Route 85 railroad bridge will be replaced with the same underclearance (11 feet ±) that presently exists. The bridge abutments will be constructed with depressed footings such that a future roadway lowering would be possible.

Comment 95-9

"Increased access to the Sudbury River and Mill Pond are among Southborough's ambitions. We agree with this concept, however, we are concerned that this will increase our noise and light pollution - especially during the winter months when the trees are bare. The parking lots will be lit with high intensity lights until 1:00 A.M. Mitigation in the form of tall conifer trees as well as light poles kept to a minimal height must be part of the design."

Response

Traffic noise levels on streets in the vicinity of Southborough Station are expected to increase approximately 1 dBA during peak traffic hours, an insignificant amount.

(Also additional information will be provided in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-10

"Some residents of Cordaville and the MBTA have suggested building a multi-level parking garage on the south side of the railroad tracks. The MBTA's own ridership projections show the parking lots to be oversubscribed by more than 100 cars on the day they open. There will be tremendous pressure on the MBTA in the future to expand the facilities. While the garage option is not currently being investigated, we would like assurances that it will not be built in the future."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-11

"Southborough has asked the MBTA to reserve all 90 spaces on the north side for their residents only. They rationalize that if they have to put up with the traffic and pollution, they ought to be granted reserved parking. Along those same lines on thinking, Hopkinton should be granted 90 spots in order to compensate for the disruption of Cedar St./Lincoln St. residents. We object to the use of state bond money being used to create exclusionary parking."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 95-12

"The MBTA has recently changed it's mind and plans no weekend service. For most of the residents of both towns, the only time they would use it is on weekends. We should insist that weekend service be a condition upon which the site is approved."

Response

See Response to Comment 2-35.

Comment 95-13

"The MBTA has done an inadequate job of studying the option of a regional station vs. multiple commuter rail stations. Please request the MBTA to seriously consider a station which would do the most good for the most people."

Response

See Response to Comment 1-9.

Comment 95-14

"Electrification of the commuter rail should be the ultimate goal of this project. Please force the MBTA to build the stations in such a way as to not preclude the future electrification of the tracks."

Response

See Response to Comment 2-12.

Comment Letter No. 96

Keith Davison (3/3/95)

Comment 96-1

"This is a troubling project. It seems to be founded on a defective agreement with CLF: to proceed if the project is at all feasible. No matter what the expense or impact on other infrastructures, such as bus transportation. No matter whether this is the wisest of most effective way to improve the public transit system."

Response

The MBTA is under a mandate (310 CMR 7.36) to implement the Worcester Commuter Rail project as long as it is not infeasible. Since the project is truly feasible and as such does not require consideration of alternatives under the mandate or under the Massachusetts SIP, the MBTA considers the project as a significant improvement to public transit.

Comment 96-2

"Although heavy rail can be very efficient when the trains are full of passengers, it has high overhead (starting the trains for the day) and is quite awkward and inflexible (long trains are run for all load levels because shortening them is much too much trouble; use of a single track for bi-directional traffic must be carefully planned and coordinated). I am baffled that we do not have single-car, one-operator, self-powered vehicles, just like buses, to use the heavy rail system during times of low traffic, so that passengers could get decent service, which would increase usage..."

Response

Diesel multiple units are generally used in start-up or low density lines. For the present, it is more cost effective for the MBTA to utilize its existing fleet, which it needs for peak service, rather than purchase additional equipment with the initial cost and added maintenance. The MBTA is exploring the use of self-propelled vehicles for some services.

Comment 96-3

"To get the full environmental benefit of commuter rail, we desperately need better facilities at the stops for people to wait out of the weather, good bicycle parking, and effective local shuttle bus system so commuters don't have to drive their cars to the train, generating start-pulse pollution, congesting roads, and occupying a parking space all day. We need much greater efforts to allow bicycles to be carried on the trains."

Response

The current MBTA policy does not consider that station buildings are a cost effective necessity for commuter rail stations. Canopies over a portion (150 feet) of the station platforms will provide protection from the elements. The stations can be an element of a multi-modal commuter system, including shuttle buses and bicycle access. The MBTA concurs with this prospect and will cooperate and participate in promoting a lesser usage of automobile access.

Comment 96-4

"No mention of effective use of technology to let waiting passengers know where the trains actually are, whether they are on schedule, and how long they will have to wait for trains that are late."

Response

A Public Address (PA) system controlled from the MBTA Commuter Rail Control Center will be installed at the new stations. Methods to coordinate the PA with the Conrail Control Center at Selkirk, NY are being actively investigated.

Comment 96-5

"What about the extra pollution created by all the cars idling in the station parking lots to keep people warm in the winter and cool in the summer!"

Response

In 1996, it is projected that 115 parking spaces will be utilized at the Millbury Station for the morning peak commuter hour trains. The maximum commuters arriving at the station for any of the four trains is 38 drivers. In the evening, the maximum number of commuters arriving at the station for any of the five trains is 40 drivers. At Grafton Station, the drivers per train are less. The relatively few vehicles and lack of close receptors will not result in any violations of carbon monoxide standards.

Comment Letter No. 97

Dorothy McMahon (3/7/95)

Comment 97-1

"No recommendation for building, patrolling, or maintaining the property seeing as how the tracks and surrounding area are now maintained."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment 97-2

"We should not be forced to take on any added burden."

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 98

Jackie Adams (3/6/95)

Comment 98-1

"We do need a stop near by - but not Otis Street - too dangerous on Fisher Mill & Maynard Streets already!

Response

(This comment will be answered in the FEIR #3, Westborough, Southborough, and Ashland Stations.)

Comment Letter No. 99

Julia McTigue Jacobs

Comment 99-1

"Department has "approved Funding for a feasibility study for a Regional Station at Route 495 and Route 9. I trust this study will have a very positive outcome."

Response

See Response to Comment 1-9.

MASSACHUSETTS BAY TRANSPORTATION AUTHORITY
Worcester Commuter Rail Extension Project
EOEA No. 9154

CERTIFICATE AND COMMENT LETTERS on July 1995 FINAL ENVIRONMENTAL IMPACT REPORT RAILROAD RIGHT-OF-WAY AND LAYOVER FACILITY

MEPA Correspondence

1. EOEA FEIR Certificate 9/14/95
2. Citizens Advisory Committee, Comments on FEIR 9/05/95

State Officials and Agencies

3. Massachusetts Historical Commission/Brona Simon 9/06/95
4. DEP Central Region/Mary J. Richards 8/31/95
5. MHD District No. 3/Peter J. Donohue, P.E. 9/07/95

City Officials, Agencies and Organizations

6. Southborough Board of Selectmen 9/06/95

7. Worcester Office of Planning and Community Development/Stephen F. O'Neil 8/31/95

Grafton - Citizen Comments

8. Lydia M. Bogar 9/06/95

Boston - Citizen Comments

9. Keith K. Davison 9/07/95

Comment Letter No. 1

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street, Boston, 02202

WILLIAM F. WELD
GOVERNOR
ARGEO PAUL CELLUCCI
LIEUTENANT GOVERNOR
TRUDY COXE
SECRETARY

Tel: (617) 727-9800
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September 14, 1995

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	:	Worcester Commuter Rail Extension (Railroad Right-of-Way and Layover Facility)
PROJECT LOCATION	:	Statewide
EOEA NUMBER	:	9154
PROJECT PROPONENT	:	Massachusetts Bay Transportation Authority (MBTA)
DATE NOTICED IN MONITOR	:	August 8, 1995

The Secretary of Environmental Affairs hereby determines that the Final Environmental Impact Report submitted on the above project adequately and properly complies with the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00).

The Worcester Commuter Rail Extension project is being reviewed by MEPA under a Special Procedure, in accordance with the MEPA regulations' provisions for Major and Complicated projects. In June of 1995, the MBTA received permission to prepare and file two separate Final Environmental Impact Reports for the project. The first would focus on proposed track and corridor improvements and on a permanent layover facility in Worcester. The second would address all remaining issues (including rail operations, station siting and construction, alternatives, ridership, revenue issues, and the feasibility of a regional station) and would provide a response to comments on the first FEIR. Today's Certificate covers the first of the two FEIRs.

Layover Facility

The preferred site for the permanent layover facility is the Conrail Yard in Worcester (Site 8). Thirteen alternatives were analyzed in the DEIR, none of which met all the MBTA's siting criteria. Site 8 was selected because it was near the proposed

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permanent commuter rail terminal station and the current interim station, had few apparent environmental issues, and was located in an active rail area with primarily non-sensitive adjacent land uses.

Because the extended or overnight idling of locomotives is the primary source of noise and air quality impacts at a layover facility, the MBTA has committed to installing electrical plug-in power sources to reduce the amount of idling time to a minimum. Another factor in determining the level of impacts is the type of locomotive that is used. About one-third of the MBTA's current fleet of locomotives are an older model (Series "1000") that produces more pollutants and noise (including "pure tone" noise) than the newer locomotives. With the planned addition of 26 new locomotives (and the retirement of the older vehicles over the next decade), the 1000 series will account for less than one-fourth of the fleet. For purposes of impact analysis, it was assumed that one locomotive in four at the layover facility would be the older model.

The major concern with the proposed layover facility was potential impacts on the Mt. Carmel apartments, a housing complex for the elderly located about 260 feet north of the layover site.[1] The FEIR analyzed whether the construction and operation of the layover facility would have adverse air quality, noise or vibration[2] impacts on the residents of the apartments. Using the assumptions that overnight electrical power would be provided and that one-fourth of the locomotives would be the older model, the FEIR found that the layover facility would have minimal impacts in terms of air quality and induced vibration, and some noise impact.

Carbon monoxide (CO) and nitrogen dioxide (NO_2) emissions from vehicles using the commuter parking lot and from the locomotives were modelled for the FEIR. Predicted 1-hour levels of CO at the Mt. Carmel apartments ranged from 4.7 ppm to 3.8 ppm (including an ambient level of 3.0 ppm), compared to a maximum 1-hour standard of 35 ppm. Eight hour levels were estimated to be

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[1] The Mt. Carmel apartments and Our Lady of Mt. Carmel Church are the nearest sensitive receptors to the site.

[2] When trains are idling or travelling at low speeds, vibration impacts are most often caused by low frequency "pure tone" noise that induces vibration in building components, rather than by direct ground-borne vibration.

between 3.3 ppm to 2.7 ppm (with a background level of 2.0 ppm), compared to the 8-hour standard of 9 ppm. Somewhat higher levels were estimated for the sidewalks between the apartments and Shrewsbury Street; however, these also were well below the standards. A preliminary analysis of NO_2 levels indicated that there would be a slight increase in NO_2 at the apartments under worst case conditions in the morning; that increase would not result in a violation of air quality standards. I note that recent advances in technology (such as afterburners and new locomotives that have emission rates even lower than the newer vehicles in the MBTA's fleet) have the potential to reduce locomotive emission levels. The MBTA should consider the retrofitting of older locomotives and the purchase of the newest models in order to minimize train emissions. (1)

In the FEIR, there is an analysis of "pure tone" noise, i.e. peaks in the sound frequency spectrum at one or more discrete frequency bands, produced by the different locomotives in the MBTA's fleet. Pure tones, especially those at low frequencies, can cause building vibration and an annoying "throbbing" sound even when the A-weighted sound level is low. The analysis shows that the older 1000 series locomotives violate DEP's noise policy for pure tones, while the newer vehicles do not. However, the frequency of the pure tones produced by the 1000 series locomotives is above the low frequency range that can cause vibration, which reduces impacts somewhat. For operational and scheduling reasons, the MBTA believes it is not feasible to restrict the use of the older locomotives on the Worcester line (which would be the most effective way to avoid impacts from pure tone noise). However, I urge it to investigate any other means that can be implemented to minimize or mitigate such impacts. (2)

The Mt. Carmel apartments are located next to an exit ramp from Interstate Route 290, in an area of high ambient noise (76 dBA L_{dn}). Based on Federal Transit Administration (FTA) criteria for noise impacts on residential land uses, an increase of 0.5 dBA L_{dn} or more would be considered to be an "impact", and an increase of 2 dBA L_{dn} or more would be a "severe impact".[3] Under the "best case" scenario (all new locomotives), the increase in noise at the Mt. Carmel apartments would be less than 0.5 dBA L_{dn}. However, the increase under the "baseline" scenario (one-fourth older locomotives) would be 1 DBA L_{dn}. Under current guidelines used by the MBTA (and which are based on FTA standards), (3)

[3] Under FTA standards, very little additional noise is allowable in areas of high ambient noise.

(3) increases in noise that cause a property to fall in the "impact" range only need to be mitigated if the increase over ambient conditions is 5 dBA or more. Nevertheless, consideration should be given to measures that can reduce noise impacts to the "no impact" level.

I find that the FEIR adequately addresses the issues concerning the layover facility that were raised in the Certificate on the DEIR. The primary concern was about noise impacts, and the noise analysis was revised and expanded in the FEIR, and mitigation measures were formulated.

The major mitigation measure that is being proposed by the MBTA to address noise and air quality impacts (the provision of electrical power to minimize engine idling) has been incorporated into the FEIR impact analyses. Without that measure, noise exposure at the Mt. Carmel apartments could be expected to increase by 8 to 10 dBA L_{dn}, clearly an unacceptable situation. Through its commitment to providing overnight electrical power the MBTA has been able to reduce potential impacts from layover operations significantly. I note that the FEIR mentions that an additional measure is planned (the provision of an air compressor to maintain brake pressure overnight) that will reduce morning locomotive idling time, and possibly further reduce noise and air impacts. A commitment to that measure should be included in the section on mitigation and the Draft Section 61 Finding that will be part of the Operations/Stations FEIR, as well as any other measures that are developed by the MBTA.

(4)

Railroad Right-of-Way

The FEIR generally has evaluated the impacts that are related to the construction of the railroad right-of-way in an adequate manner. However, there are several areas where additional analysis is required. The major areas that need further clarification include historic and archaeological resources, and vibration impacts. The Special Procedure for this project was set up to allow unresolved issues from the first FEIR to be further addressed in the second FEIR, and I expect that the proponent will do so.

(5)

The second FEIR must fully address the concerns of the Massachusetts Historical Commission. Summary results from the intensive survey for the second railroad track must be included. If possible, that information should be provided to MHC before the completion of the FEIR, so that its recommendations for

(6)

avoiding, minimizing or mitigating impacts can be incorporated into the document. I note that the MHC has found the building and bridge inventory forms that were provided by the proponent to be incomplete and inadequate. The MBTA and its cultural resources consultant should meet with MHC staff as soon as possible to correct these deficiencies. (7)

An evaluation of vibration impacts was included in the right-of-way FEIR because some potential mitigation measures would affect the construction of the rail bed, and therefore could have secondary environmental impacts. The FEIR found that there would be annoyance-level vibration impacts on 19 residences, but all impacts would be below the level that would cause structural damage. Because of the low frequency content of the vibration that the commuter rail trains produce, potential path vibration control treatments (such as ballast mats) would be largely ineffective, and are not being proposed. The only vibration mitigation measure being proposed is to regularly maintain train wheels and trackbed.

More detailed information should be provided concerning vibration impacts on the 19 residences. This should include a description of the magnitude of impact on each structure, so that the effectiveness of alternative mitigation strategies can be better evaluated. The feasibility and effectiveness of strategies such as reduction of train speeds, building acquisition, or purchase of vibration easements should be discussed in detail. (8) (9)

I note the concerns of the CAC about the possibility that vibration impacts will be greater than described in this FEIR if some or all of the intermediate stations are not built. If assumptions concerning the number or location of intermediate stations change, the vibration analysis must be revised. Other issues that the CAC has raised, including vibration impacts on commercial land uses such as restaurants, should also be addressed. (10) (11)

A number of comments were received concerning the Route 85 bridge in Southborough. There is a difference of opinion among the MBTA, the MHD, and the Town of Southborough whether the bridge clearance should be raised, and if so, to what height. This issue is relevant to this office only to the extent that the bridge design impacts environmental resources. The MBTA, MHD and the Town should continue their discussions, and try to resolve their differences. If the bridge height that is selected differs from that described in the right-of-way FEIR, an analysis of its environmental impacts should be included in the second FEIR. (12)

(13) (14) DEP notes that a number of its comments on the DEIR were not fully addressed in the right-of-way FEIR. Those comments must be addressed in the Operations/Stations FEIR (along with all remaining comments on the DEIR). In addition, DEP's comments concerning application of herbicides near public water supplies (as well as municipal water supplies) should be noted, and the plans or maps that they request should be included in the second FEIR.

Miscellaneous

(15) Information on alternatives, ridership, and revenue issues has been included in this FEIR in order to explain the project's background. That information also will be provided in the second FEIR, at which time it will be fully reviewed by this office.

Finally, it has been brought to my attention that track work has been occurring in the Worcester rail corridor. The proponent has assured me that this work is being conducted by Conrail, and is not part of this project. The MBTA is aware that all environmental analysis that is required under MEPA must be adequately completed before construction of this project can begin.

September 14, 1995
Date

Trudy Coxe

Comments received : DEP/CERO, 8/31/95
Worcester OPCD, 8/31/95
CAC, 9/5/95
MHC, 9/6/95
Southborough Selectmen, 9/6/95
L. Bogar, 9/6/95
MHD, 9/7/95
K. Davison, 9/7/95

TC/JGH/jh

Comment Letter No. 2

Worcester Commuter Rail Extension Project
Citizens Advisory Committee

c/o David C. Robbins, Chair
92 George Hill Rd.
Grafton, MA 01519

September 5, 1995

RECEIVED
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MEPA

Secretary
Executive Office of Environmental Affairs
100 Cambridge St. – Room 2000
Boston, MA 02202

Attn: MEPA Unit

Re: Worcester Commuter Rail Extension Project, EOEA #9154

Dear Secretary Coxe:

The Citizens Advisory Committee (CAC) submits for your consideration the following comments on the Final Environmental Impact Report (FEIR) for the Railroad Right-of-Way and Layover Facility for the above-referenced project.

1. Vibration Impacts

1.1 FEIR Lacks Worst-Case Vibration Impact Analysis

As explained in the proponent's response to the CAC comments included in the FEIR, the vibration impact analysis was performed under the assumption that all five intermediate stations would be built, and thus that train speeds in the vicinity of the intermediate stations would be low.

We note that vibration impacts are greater at higher speeds, and that it is by no means certain that all five intermediate stations will be constructed. We further note that vibration impact analysis was included in this FEIR because of its relationship to the track improvements: any vibration impact mitigation found to be necessary (e.g., ballast mats) may need to be constructed as part of the track improvements.

We therefore conclude that it is essential that the proponent analyze the worst-case vibration impacts (by assuming no intermediate stations and therefore higher speeds) before commencing construction of the track improvements. We recommend that the Secretary require the proponent to submit a supplemental FEIR, containing a worst-case vibration analysis and showing the required mitigation or demonstration the lack of need for mitigation, before being permitted to commence construction of the track improvements. (1)

1.2 Vibration Impacts on Commercial Property

The CAC continues to believe that the potential impacts of vibration upon certain commercial properties (e.g., Fitzgerald's General Store and the Ipanema Restaurant in Southboro, and Burnam's Restaurant in Ashland) need to be analyzed. (2)

The proponent, in response to the CAC's comment in the FEIR, cites Federal standards that exempt commercial properties from consideration for vibration impact. We would point out that for this project Federal standards are not the final word, since this project is not a Federal project. The proponent also states that there are no official guidelines, Federal or otherwise, for analysis of the impacts of vibration upon commercial properties.

The proponent also states that, in its experience, commercial properties similar in kind and location to those of concern to the CAC do not experience adverse vibration impacts.

"particularly near a station where trains will be traveling at low speed." While the properties of particular concern to the CAC are indeed located near a *proposed* station site, it is by no means certain (as we have already noted) that the proposed stations will be constructed. The relevant experience, then, would be that of similar properties located near a right-of-way where trains travel at full speed. Is there any such relevant experience? Are patrons of a general store or restaurant not significantly bothered by the vibration of a train passing nearby at full speed? 3

Recognizing that there may not be generally-accepted standards or guidelines for the analysis of vibration impacts upon commercial properties where the patrons might be disturbed by excessive vibration, the CAC recommends that the Secretary specify some project-specific standards for the analysis of such vibration impacts. 4

1.3 Potential Impact of Increased Freight Service Speeds

The track improvements proposed by the MBTA may make it feasible for the other services using the track (Amtrak passenger and Conrail freight) to run at higher speeds. We observe that the vibration impacts from typical freight trains are much more noticeable than are those from passenger trains.

The CAC therefore asks the question, will the proposed track improvements lead to an increase in operating speeds for any class of freight service? If so, the proponent should be required to analyze the impacts, including in particular the vibration impacts, of such increased freight speeds. 5

2. Sequencing of Environmental Review and Commencement of Construction

CAC members have observed that some of the proposed track improvement work has already commenced, before the Secretary has accepted the FEIR. It would appear that this work is being performed by Conrail, but is to be funded by the MBTA as part of the Worcester Commuter Rail Extension Project. The CAC does not understand how it can be legal for work proposed as part of this project to commence prior to the Secretary's acceptance of the FEIR that covers that work. 6

3. Route 85 Bridge

To provide for pedestrian access from the proposed Southboro station to the Hopkinton State Park, the Town of Hopkinton has expressed interest in a pedestrian overpass over Route 85, parallel to the tracks and part of, or adjacent to, the reconstructed bridge. The CAC strongly concurs with this suggestion, as such an overpass would fit well with other mitigation proposed or requested for the Southboro station site. We recommend that the proponent add such an overpass to the plans for reconstruction of the Route 85 bridge. 7

4. Map Details in Error

The maps on pages 3-10 and 4-8 show several incorrect street names in Hopkinton. In particular, Cedar Street, River Street, and Cordaville Road are mislabeled; Lincoln Street should be labeled; and an unnamed street is incorrectly drawn. The maps on pages 3-9 and 4-7 show Fruit Street passing underneath Route 495 when in fact it passes *over* 495, and they omit Old Flanders Road entirely. All maps should be reviewed for accuracy. 8

5. Impacts Upon Framingham

The impacts upon pedestrian and vehicular traffic in Framingham, particularly at the intersection of Routes 126 and 135, should be addressed more thoroughly in the next FEIR in conjunction with the analysis of the impacts of operation of the proposed service. 9

6. Ridership Projections

A recent editorial in the Worcester Telegram & Gazette notes that the Interim Service has been very successful, attracting ridership as high as 440 in one day, and averaging around 400 per

Comment Letter No. 2

day. We note that this average exceeds the year 2001 projected average reported in the Draft Environmental Impact Report (DEIR) for this project, and that the peak of 440 approaches the projected year 2011 peak reported in the DEIR. And this is with the Interim Service of only three trains per day in each direction!

The CAC observes that with Interim Service significantly exceeding the projections reported in the DEIR, the ridership projections for full service, with or without intermediate stations, are in clear need of revision. While ridership projections are merely mentioned in passing in the current FEIR, the next FEIR ought to revisit the ridership projections in light of the experience obtained with the Interim Service. (10)

Very truly yours,

David C. Robbins

Citizens Advisory Committee
David C. Robbins, Chair
508-839-6862
508-839-9708 (FAX)

cc: CAC members
Edwards & Kelcey
MBTA

Comment Letter No. 3

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

September 6, 1995

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SEP - 1995
MEPA

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

ATTN: MEPA Unit

RE: Worcester Commuter Rail Extension Project, Framingham, Ashland, Southborough, Westborough, Grafton, Millbury, and Worcester. MHC #9415. EOEA #9154.

Dear Secretary Coxe:

Staff of the Massachusetts Historical Commission have reviewed the Final Environmental Impact Report (FEIR) for the Railroad Right-of-Way and Layover Facility, received by the MHC on August 14, 1995.

As you know, the Draft EIR proposed to include a summary of the results of the intensive (locational) archaeological survey in the Final EIR. Sufficient information required to review and issue a permit for the intensive survey of a portion of the project (the second railroad track) was received by the MHC on July 24, 1995. A permit for the survey of the portion of the project that is the subject of the FEIR was issued to Timelines, Inc. on July 26, 1995.

Since summary results of the intensive survey were not now included in the FEIR, and the report of the investigation has not yet been received by the MHC, it is not possible at this time to determine what effect the second railroad track will have on significant historic and archaeological resources, or to provide recommendations to avoid, minimize, or mitigate impacts to these resources. (1)

The FEIR appears to indicate that these results are now proposed to be provided in subsequent FEIRs (pp. 4-63; Appendix: "Response to CAC Comments," pg. 4). Contingency for additional site evaluation of any potentially important archaeological resources is provided. Mitigation through "a salvage process," by which I take to mean archaeological data recovery (950 CMR 70), is proposed to mitigate any adverse effects to significant historic and archaeological resources. Prudent and feasible alternatives to avoiding adverse impacts through project redesign should first be considered by project planners before committing to irrevocable loss of these resources. I am particularly concerned with the proposal on page ES-12 that "appropriate measures will be employed during construction to comply with MHC regulations." Appropriate treatment of these resources should precede construction. (2) (3)

220 Morrissey Boulevard. Boston. Massachusetts 02125 · (617) 727-8470
Fax: (617) 727-5128 TDD: 1-800-392-6090

Comment Letter No. 3

(4) In regard to the historic and architectural resources within the proposed project area, MHC staff received the final submission of building and bridge inventory forms on June 5, 1995. Evaluation of this information by MHC staff has been hampered by the incomplete nature of the forms which do not meet the Secretary of the Interior's "Standards and Guidelines for Archeology and Historic Preservation"(48 FR 44716-42) nor the standards and guidelines for the survey of historic properties as set forth in the MHC's "Historic Properties Survey Manual." Aside from (5) the consultation of assessors records, little original research was completed to provide sufficient historical context. Many of the historical narratives rely heavily on MHC reconnaissance survey reports for contextual information. In several instances, properties are incorrectly mapped or misidentified by address; a master map showing all inventoried properties identified by address (6) is needed. No recommendations or criteria statements for National Register eligibility were included in the submittal. Inventory forms completed for the bridges lacked sufficient technical information regarding engineering significance, historic context, and condition. MHC staff (7) recommend a meeting with the MBTA and the cultural resource consultants to discuss how to address the deficiencies of the cultural resource survey.

(8) I continue to be concerned about the scheduling of the publication of the environmental review documents for this project, which have appeared in advance of planning information on historic and archaeological resources. I recommend that the portion of the project that is the subject of the FEIR not proceed until the impacts to important historic and archaeological resources have (9) been considered fully and treated appropriately. In reviewing the permit application for the intensive survey of the portion of the project that is the subject of the FEIR, MHC expressed concern that the scope of work for the survey did not include the proposed station sites (MHC 7/26/95, copy enclosed). I am also recommending, again, that the intensive (locational) archaeological survey for the complete project impact area (including the proposed stations) (10) proceed as soon as possible, so that reviewers of subsequent FEIRs will have the benefit of this information.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), MGL Chapter 9, ss. 26-27C (950 CMR 70-71), and MEPA (301 CMR 11). Please feel free to contact Allen Johnson or Edward L. Bell of my staff if you have any questions or need further information.

Sincerely,

Brona Simon

Brona Simon
State Archaeologist
Deputy State Historic Preservation Officer
Massachusetts Historical Commission

Enclosure (MHC 7/26/95)

xc: see attached

Comment Letter No. 3

xc: Local Historical Commissions
FTA
Diana Parcon, MBTA
Kate Atwood, USACOE/NED-Regulatory
Susan Coin, EPA/Region 1
DEP/CERO
DEP/NERO
Ross B. Dindio, MHD
Michael Roberts, Timelines, Inc.

Comment Letter No. 3

The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

July 26, 1995

Michael Roberts
Timelines, Inc.
410 Great Road, B-14
Littleton, MA 01460

RE: Worcester Commuter Rail Extension Project. MHC #9415.

Dear Michael:

Thank you for submitting additional information to the Massachusetts Historical Commission regarding the proposed project referenced above, received by the MHC on July 24, 1995.

MHC understands that the intensive survey is proposed for only a portion of the project impact area, i.e., impacts associated with the second railroad track, but not the proposed station sites. A justification as to why project areas have been excluded at this time from the survey has not been received by the MHC. However, in conversation with Elena Decima of your staff, I understand that evaluation of archaeological impacts for proposed stations have been delayed while other alternatives for stations design and locations are being considered by project planners.

As I am of the understanding that this segmentation of the survey area will not affect the schedule for completion of the environmental review or its recommended scope, a permit for the intensive survey has been issued to locate and identify sites that may be impacted by the second railroad track. If my understanding is not correct (i.e., if a change in the proposed project or a change in the scope and schedule of environmental review documents has been proposed), then please contact me as soon as possible. I recommend that you consult with your client on this point.

I recommend that future permit applications submitted to this office more clearly indicate whether the scope of surveys differ from that which we have recommended.

These comments are offered to assist in compliance with MGL c. 9, ss. 26-27C (950 CMR 70). Please feel free to contact Ed Bell of my staff if you have any questions or need further information.

Sincerely,

for: Brona Simon
State Archaeologist
Deputy State Historic Preservation Officer
Massachusetts Historical Commission

220 Morrissey Boulevard, Boston, Massachusetts 02125 · (617) 727-8470
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Comment Letter No. 4

Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Protection
Central Regional Office

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William F. Weld
Governor
Argeo Paul Cellucci
Lt. Governor

Trudy Coxe
Secretary
David B. Struhs
Commissioner

AUGUST 31,1995

Trudy Coxe, Secretary
Executive Office Of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, Massachusetts 02202

RE:EOEA #9154
FINAL ENVIRONMENTAL IMPACT REPORT
RAILROAD RIGHT-OF-WAY AND LAYOVER FACILITY
WORCESTER COMMUTER RAIL EXTENSION PROJECT

Dear Secretary Coxe:

The Department of Environmental Protection, Central Regional Office, Division of Water Supply, (The "Department") has reviewed the Final Environmental Impact Report (FEIR) on the Railroad Right-Of-Way and Layover Facility for the Worcester Commuter Rail Extension Project, EOEA #9154, and would like to offer the following comments.

A "Request for Project Change" was filed in May 1995 to allow the filing of two Final EIR documents to address different aspects of the project. The first FEIR addresses issues surrounding the permanent layover facility in Worcester and the construction of the rail and signal improvements needed for the two-track operation of the line. A second FEIR will address proposed rail operations and station construction and will be submitted for public review and comment in the future. The "Request for Project Change" also states that the second FEIR will "address all remaining questions other than those dealt with in the Track and Layover Final EIR." In the Department's comments of March 9, 1995 regarding the DEIR, several issues were raised relative to right-of-way activities along the railroad corridor, in addition to station location and design/construction issues. Not all of these issues have been adequately addressed in the first FEIR. The Department acknowledges that it was likely that more time was needed to adequately address these issues, however, the Department assumes that all unanswered issues (1-2;6-15;18-27) in this FEIR, including those relative to right-of-way activities, will be addressed in the second FEIR.

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Comment Letter No. 4

EOEA #9154
FEIR Volume 1
Page 2

The Department is satisfied with the responses to comments that were provided to date. However, the Department wishes to emphasize one inconsistency in the body of the document that was also present in the DEIR. It is stated on page 4-56 that herbicides are not applied within 400 feet of any municipal water supply well, 50 feet of any private drinking water wells or within 100 feet of any surface drinking water supply. In contrast, the Rights of Way Regulations 333 CMR 11.04(2)(a) state that no herbicides shall be applied within 400 feet of any public ground water supply well. It is important to note that public ground water supply wells are not limited to municipal ground water supply wells as is implied in the FEIR. The Department's definition of a public water supply is a water supply which serves 25 people a day at least 60 days per year or which has 15 service connections; it is not dependent upon ownership. Therefore, public water supplies include municipal and privately owned public water supplies. Accordingly, herbicides shall not be applied within 400 feet of any public water supply well. All registered public water supply sources adjacent to the project must to be identified and labelled on the plans/maps in the second FEIR and addressed appropriately. In addition, no herbicides shall be applied within the primary recharge area (delineated Zone II or one half mile radius) of a public ground water supply well except by selective application and not more than once every two years.

(2) (3) (4)

For additional information regarding water supply issues associated with this project, please contact Andrea Lemerise at (508)792-7650 ext. 3723.

Very truly yours,

Mary Richards

Mary Richards,
MEPA Coordinator

Comment Letter No. 5

MASS HIGHWAY
William F. Weld, Governor | Argeo Paul Cellucci, Lieutenant Governor | James J. Kerasiotes, Secretary | Laurinda T. Bedingfield, Commissioner

September 7, 1995

Statewide
Worcester Commuter Rail Extension
EOEA No. 9154

RECEIVED
SEP 11 1995
MEPA

Ms. Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Attention: Janet Hutchins, MEPA Unit

Dear Secretary Coxe:

The Massachusetts Highway Department (MHD) has reviewed the Final Environmental Impact Report (FEIR) for the railroad right of way and layover facility portions of the Worcester Commuter Rail Extension Project. Issues related to the siting and resultant impacts of the proposed intermediate stations will be addressed in a subsequent FEIR.

As indicated in our review of the original draft EIR for this project, MHD permits may be required for access to several of the proposed intermediate stations depending on the final selection of the sites. (1)

The improvements along the railroad right of way include six bridge structures that are proposed to be replaced, modified or removed by the MHD. Of these bridges five are currently under reconstruction (Hamilton Street - Worcester); advertised for reconstruction (Fountain Street - Framingham); or under design (High Street - Ashland, Fountain Street - Ashland, Pine Street - Grafton). The remaining structure (Fischer Street - Westborough) is programed for removal in the near future. With the exception of the Pine Street bridge in Grafton, which is adjacent to the proposed location of an intermediate station, the completion of these bridge projects does not appear to be required in order to allow the overall commuter rail project to proceed.

Although not specifically necessary in conjunction with the commuter rail project, a critical element in the upgrading of this railroad corridor is the provision of sufficient overhead railroad clearance to accommodate double stack container freight service. This particular corridor is a major element of the State's designated double stack network. The MHD is an active participant in the overall effort to develop this network and supports the MBTA's efforts to incorporate improvements to the Shrewsbury Street location in Grafton which will provide the required clearance.

Comment Letter No. 5

One of MHD's primary concerns regarding the commuter rail project relates to the improvements proposed to the railroad bridge at Route 85 (River Street) in Southborough. The existing 11 foot underclearance for this structure is substandard. Although the bridge will be replaced as part of the project, the FEIR indicates that changes to the underclearance are not currently being considered. The FEIR goes on to indicate that the decision to maintain the current underclearance is largely based upon the community's goal of eliminating the possibility of truck traffic impacts on local streets.

This section of Route 85 is classified as a minor arterial under the Federal Aid Urban System. Minor arterials interconnect and augment the principal arterial system. Minor arterials place more emphasis on land access and as a result offer lower traffic mobility. Such a facility typically carries local bus routes and provides intra-community continuity.

Based on the function of this section of Route 85, improvements to the facility should be designed to accommodate truck traffic. The recommended minimum underclearance for bridge structures located on this type of facility is 14'-6". It should be noted that efforts to eliminate truck traffic impacts to local streets in this area by constraining the underclearance on a roadway designated to carry such vehicles potentially results in an increase in similar types of impacts to other areas, possibly local, as vehicles divert around the constraint. The MHD strongly recommends reconsideration of this particular element of the railroad corridor improvements. (2)

As noted above, the MHD is actively involved in a number of the railroad corridor improvements identified in the FEIR. Although the completion of many of these improvements is not necessary for the commuter rail project to proceed, there are benefits to completing the work in a coordinated manner. The MHD will continue its discussions with the proponent and the affected communities in order to address issues related to the scheduling and design of the improvements along the railroad corridor.

If you have any questions concerning this matter, please feel free to contact me at (508) 754-7204.

Very truly yours,

Peter J. Donohue, P.E.
District #3 Highway Director

Comment Letter No. 5

PDS/pds

pc: PDS
Ross Dindio, Chief Engineer
Charles Sterling, Traffic Engineer
Stephen O'Donnell, Highways & Structures
Luisa Paiewonsky, Manager, P/PDU
Dennis Coffey, EOTC
Southborough Board of Selectmen
M.O. File

Comment Letter No. 6

BOARD OF SELECTMEN

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MEPA

September 6, 1995

Secretary Trudy Coxe
Mass. Executive Office of Environmental Affairs
100 Cambridge St.- 20th Floor
Boston, MA 02202
Attn.: MEPA Unit

Re: Comments regarding Final EIR Railroad Right-of-way Layover Facility
Worcester Commuter Rail Extension Project, EOEA- #9154

Dear Secretary Coxe:

The following represents continued concerns of the Town of Southborough regarding the Route 85 Bridge replacement, which is outlined in this Final EIR. While our comments are directed to this particular part of the project, we recognize that subsequent review of the station and its mitigation is ongoing, and we shall review that during the second FEIR when presented.

Bridge Height

The height clearance issue has not clearly been resolved in the FEIR. In responses to CAC comments, July 27, 1995, it is stated that the bridge would remain a restricted structure, and the vertical clearances still would be less than 14'6". Any change in clearance must be one foot or less. Furthermore, comments will be coordinated during design phases. (1)

Access During Construction

It is stated that the roadway will remain accessible during construction. Traffic must be allowed to use this roadway, as no suitable detour exists. (2)

Construction Activities

All efforts must be made to coordinate construction activities, as they relate to the businesses, and residences in the general vicinity. In this regard, a method of reporting during construction should be set up, to coordinate and inform the public of activities. (3)

Comment Letter No. 6

Design

(4) We reserve the right for continued right of comment during the design phases. While we recognize that the current structure is not historically significant, replacement of the current granite supporting structure to concrete, does affect the historic nature of the neighborhood, and all efforts must be made to replicate the existing structures.

Station Design

(5) While comment on the station design is not included in this report, it should be noted that one present concern of the design is the placement of a portion of the raised platform directly behind several residences at the westerly end of the station platform. The Town would prefer the station platform be shifted east, so that the platform, and its lighting and other activities will not be directly behind the residences. This shift will extend the platform onto the bridge. Any construction being contemplated must take this into account, especially if the width of the bridge (14') must be enlarged to accommodate the platform extension.

Other Concerns

(6) Coordination of Wetlands Protection, coordination of the project with Town Officials, details of construction yard activities, and as mentioned above, continued discussion of design considerations continue to be priority concerns of the community.

Very truly yours,

Thomas W. McAuliffe
Chairman

MWD/jf

Comment Letter No. 7

CITY OF WORCESTER, MASSACHUSETTS

THOMAS R. HOOVER
City Manager

STEPHEN F. O'NEIL
Director

Telephone
799-1400

EXECUTIVE OFFICE OF THE CITY MANAGER
OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT
418 MAIN STREET, SUITE 400
WORCESTER, MASSACHUSETTS 01608-1885

August 31, 1995

RECEIVED
SEP 5 1995
MEPA

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Attention: MEPA Unit

RE: EOEA # 9154
Worcester Commuter Rail Extension Project, Worcester, Massachusetts
Final Environmental Impact Report

Dear Secretary Coxe:

Worcester's Office of Planning and Community Development (OPCD) has reviewed the Final Environmental Impact Report (FEIR) for the Worcester Commuter Rail Extension project's Railroad Right-of-Way and layover facility components proposed for Worcester. OPCD offers the following comments for your review.

This project provides a much needed transportation link to Worcester and Central Massachusetts. The establishment of commuter rail service from Boston to Worcester is a regional solution to a long range transportation problem. Also, the extension of commuter rail service is a key component in Worcester's downtown economic development plan. OPCD continues to fully support the Worcester Extension project and its elements.

In our comment letter regarding the Draft Environmental Impact Report (DEIR) dated 2/24/95, OPCD addressed six issues. These issues and the MBTA's response to each are listed below.

Comment Letter No. 7

- OPCD requested that the MBTA consider plans for remodeling the Layover Facility once the rehabilitation of Union Station is complete. *The MBTA has no plans for remodeling the layover facility, with the possible exception of redesignating additional employee parking if required.*
- OPCD requested that the MBTA make the Layover Facility a double-ended facility once Union Station becomes the station for the commuter rail extension. *The MBTA responded that there is insufficient land area for a double-ended facility, to the extent that such a facility would encroach into the Union Station site.*
- OPCD requested that the MBTA analyze emission factors of older locomotives such as the 1000-series. *MBTA responded by developing a worst case scenario using only the older locomotives, in which instance no violations of the NO_2 standard were found.*
- OPCD requested that the MBTA develop mitigation strategies for instances when the 1000-series locomotives are required to layover. *The MBTA responded that retro-fitting the locomotives is not practical, and most will likely be retired from service over the next decade.*
- OPCD requested the MBTA to construct a new layover facility as soon as possible. This request was made in large part due to complaints made by area residents regarding overnight noise and diesel fumes emitted by the idling engines. *The MBTA responded by installing an electrical power source at the temporary layover, eliminating the need for locomotives to idle overnight.*
- OPCD requested the MBTA to expand the current interim service schedule to include evening and weekend service from Boston to Worcester. *The MBTA did not offer a response to this request.* OPCD respectfully requests that the MBTA consider the expansion of interim service from Worcester to Boston to include reverse commuting, non-peak hour and weekend service.

(1)

The Office of Planning and Community Development appreciates this opportunity to comment on this Final Environmental Impact Report and trust that any outstanding questions will be addressed to me at your convenience.

Sincerely,

Stephen F. O'Neil

STEPHEN F. O'NEIL
Director

Comment Letter No. 8

8 Bernard Road
North Grafton, MA 01536

September 6, 1995

RECEIVED
SEP 7 1995
MEPA

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Re: Worcester Commuter Rail Extension
MEPA # 9154

Dear Secretary Coxe:

As a resident of Grafton and a member of the Worcester Commuter Rail CAC for three years, I am compelled to add my personal comments to those of the CAC in regard to the Final EIR for Track and Layover Facilities:

(1) The MBTA has not adequately addressed noise and vibration issues. The CAC comments dated July 27, 1995 relative to Sections 4.1 and 4.3 must be responded to in more detail as soon as possible. (1)

(2) There is obviously track and signal work ongoing in the Grafton-Westborough area (and has been for at least two weeks). Although the work seems to be under the supervision and control of Conrail, it would be safe to presume that the work is being done at the request of the MBTA. I consider it outrageous that such work is proceeding during the EIR comment period. It would certainly make a reasonable person believe that any comments that they may make to you will not be heard by the MBTA, as they are proceeding on their schedule, not that of the towns and people impacted by their project. (2)

(3) The MBTA and their liability carrier should read Section 6.0 of the CAC comments of July 27, 1995 concerning the parking area at the Interim Station. The lighting, walkways, general lot maintenance and broken parking meters at adjacent lots do not show the best face of the MBTA or the City of Worcester. Someone is going to be hurt, and the aggravating factors for liability are measurable. (3)

(4) If there is to be a new proposal for a regional station at the Turnpike/I-495 Interchange, I ask that you void this Final EIR until such time as the CAC and interested parties can review and comment on the impact of such a regional station on the issues of noise and vibration, right of way drainage, fencing, mitigation measures and hazardous materials. That some of these issues were discussed at a so-called "closed meeting" on August 10, 1995 in Westborough makes the need for your attention even more critical. Andrew Brennan of the MBTA should be compelled to memorialize that meeting, and explained its secretive nature, to the CAC and interested parties. The CAC has voted to request this information from him no later than September 30, 1995.

(4)

Thank you in advance for your review of my comments and your dedication to reviewing this project in such detail.

Sincerely,

Lydia M. Bogar

Lydia M. Bogar

Comment Letter No. 9

KEITH K. DAVISON
37 Hastings St., #206-ME
West Roxbury, MA 02132
(617) 327-5761

JH

September 7, 1995

RECEIVED SEP 12 1995 MEPA

Trudy Coxe, Secretary, EOEA
attn: MEPA Unit
100 Cambridge St., 20th Floor
Boston, MA 02202

fax 727-2754

Re: EOEA #9154 Worcester FEIR - Railroad Right-of-Way and Layover Facility

p.ES-3
Contrary to the claim that this will "largely complete" MBTA service area extension, a number of other additional projects loom, particularly New Bedford/Fall River. (1)

The imperative to implement this project "unless infeasible" should not be allowed to derail the MEPA requirements of full public process consideration of impacts and alternatives. (2)

Tables 2.1 do not carry through the most significant calculations in a uniform, integrated fashion comparing rail and bus. The choice of "preferred alternative" is not supported by the figures presented. (3)

Subsequent changes in projected costs are so immense as to discredit the underlying methodology. Ridership projections are hypothetical exact numbers; an estimated range would be more honest. (4)

2.2 Financial Feasibility
This discussion does not adequately acknowledge the many other projects the MBTA is likely to, and should, undertake over the next 20 years. The MBTA deficit is large and growing. There is not a sound financial basis for the system, nor the prospect of one. Ever dollar must be spent as effectively as possible, lest there be a "revolt" drastically curtailing operations. This would have dire environmental impacts. (5)

Local stations should maximize non-car access, esp. in view of car start-pulse pollution characteristics. (6)

Comment Letter No. 9

Pedestrian Safety

(7) Accidents happen, and the injuries are regrettable. But in the vast majority of cases, great carelessness or intentional risk-taking is to blame. Ultimately, there is not a duty or even the possibility of protecting people from themselves. ROW fences are not

(8) appropriate in rural or semi-rural settings. Horn usage should be locally determined in consultation with the affected community, not federally dictated.

Section 6.0 Layover Facility

(9) No one wants to live next to throbbing train engines every night at 1 am! This would especially apply on hot summer nights; if abutters do not have air conditioning, the Project should assist. Since train parking locations are fixed, acoustic barriers would be cost effective.

(10) Is there a commitment to park the noisiest train first and start it up last?

(11) Why does the whole empty train have to be fully lit and air conditioned for a half hour while idling/parking? Why can't external power be used for this?

(12) p.6-9 No commitment to minimize the various sources of noise at layover facility.

The MBTA responsiveness to community concerns at other, existing layover facilities is the best guide to future prospects at this facility.

Comment #8-4

(13) The vegetation management Yearly Operational Plans are inadequate. A sincere effort must be made to generate management plans that do not require regular broadcast application of herbicides.
What types of herbicides were used "150 years" ago?

The FEIR has been split into two pieces, but as they are to be published sequentially, in an important sense each is another round of the overall public process. It is a shame that this opportunity to inform the public dialogue by publishing DEIR comments (2:1 to save paper, separate appendix sent only to those who specifically request it) has been

(14) neglected. All comments on this FEIR should be published in the next one, even if no responses are included.

- Keith K. Davis

FEIR RESPONSES

RESPONSE TO COMMENTS ON JULY 1995 FEIR - RAILROAD RIGHT-OF-WAY AND LAYOVER FACILITY

Comment Letter No. 1

EOEA FEIR Certificate (9/14/95)

Comment 1-1

"The MBTA should consider the retrofitting of older locomotives and the purchase of the newest models in order to minimize train emissions."

Response

The MBTA has actively pursued upgrades to its locomotive fleet, within it's budget, in the past and will continue to do so. Newly purchased locomotives will be state of the art and older locomotives are upgraded during their mid-life overhauls.

(Also see Response to DEIR Comment 1-16)

Comment 1-2

"For operational and scheduling reasons, the MBTA believes it is not feasible to restrict the use of the older locomotives on the Worcester line (which would be the most effective way to avoid impacts from pure tone noise). However, I urge it to investigate any other means that can be implemented to minimize or mitigate such impacts."

Response

The MBTA will continue to monitor and evaluate noise impacts from locomotives. Cost effective measures will be implemented as they become available.

Comment 1-3

"Under current guidelines used by the MBTA (and which are based on FTA standards), increases in noise that cause a property to fall in the 'impact' range only need to be mitigated if the increase over ambient conditions is 5 dBA or more. Nevertheless,

consideration should be given to measures that can reduce noise impacts to the 'no impact' level."

Response

See Section 3.7 of the FEIR for Millbury Station - Grafton Station - Railroad Operations for a discussion of the MBTA's mitigation policy.

Comment 1-4

"I note that the FEIR mentions that an additional measure is planned (the provision of an air compressor to maintain brake pressure overnight) that will reduce morning locomotive idling time, and possibly further reduce noise and air impacts. A commitment to that measure should be included in the section on mitigation and the Draft Section 61 Finding that will be part of the Operations/Stations FEIR, as well as any other measures that are developed by the MBTA."

Response

See Draft Section 61 Findings in Appendix C.

Comment 1-5

"The major areas that need further clarification include historic and archaeological resources, and vibration impacts."

Response

The MBTA has continued coordination with the Massachusetts Historical Commission to complete the evaluation of historic and archaeological resources. See Memorandum of Agreement in the Appendix of FEIR #2, Millbury Station - Grafton Station - Railroad Operations. Vibration impacts presented in the first FEIR have been updated in FEIR #2.

Comment 1-6

"The second FEIR must fully address the concerns of the Massachusetts Historical Commission. Summary results from the intensive survey for the second railroad track must be included. If possible, that information should be provided to MHC before the completion of the FEIR, so that its recommendations for avoiding, minimizing, or mitigating impacts can be incorporated into the document."

Response

See Memorandum of Agreement between MBTA and MHC in the Appendix of FEIR #2, Millbury Station - Grafton Station - Railroad Operations.

Comment 1-7

"I note that the MHC has found the buildings and bridge inventory forms that were provided by the proponent to be incomplete and inadequate. The MBTA and its cultural resources consultant should meet with MHC staff as soon as possible to correct these deficiencies."

Response

The MBTA has held a series of meetings with the MHC to address and resolve all outstanding issues. (Also see Memorandum of Agreement in Appendix H).

Comment 1-8

"More detailed information should be provided concerning vibration impacts on the 19 residences. This should include a description of the magnitude of impact on each structure, so that the effectiveness of alternative mitigation strategies can be better evaluated."

Response

Vibration effects have been revised and updated in FEIR #2, including temporary effects of Basic Service to Millbury and Grafton only. The magnitude of vibration impacts are shown on location maps in the Noise Appendix of FEIR #2.

Comment 1-9

"The feasibility and effectiveness of strategies such as reduction of train speeds, building acquisition, or purchase of vibration easements should be discussed in detail."

Response

See text in Section 5.2 of FEIR #2, Millbury Station - Grafton Station - Railroad Operations.

Comment 1-10

"I note the concerns of the CAC about the possibility that vibration impacts will be greater than described in this FEIR if some or all of the intermediate stations are not built.

If assumptions concerning the number or location of intermediate stations change, the vibration analysis must be revised."

Response

Additional vibration analysis has been performed to address service to Millbury and Grafton only (See Section 5.2 of FEIR #2).

Comment 1-11

"Other issues that the CAC has raised, including vibration impacts on commercial land uses such as restaurants, should also be addressed."

Response

Vibration impacts on commercial properties in Southborough were addressed in responses to CAC comments dated July 27, 1995, in the first FEIR. Responses to additional CAC comments on this subject are contained herein (see Comment Letter No. 2).

Comment 1-12

"A number of comments were received concerning the Route 85 bridge in Southborough. There is a difference of opinion among the MBTA, the MHD, and the Town of Southborough whether the bridge clearance should be raised, and if so, to what height. This issue is relevant to this office only to the extent that the bridge design impacts environmental resources. The MBTA, MHD and the Town should continue their discussions, and try to resolve their differences. If the bridge height that is selected differs from that described in the right-of-way FEIR, an analysis of its environmental impacts should be included in the second FEIR."

Response

Discussion among the MBTA, MHD and the Town has resulted in a plan for a reconstructed Route 85 railroad bridge which will replicate the 11-foot (±) underclearance. In response to a request by the MHD, the new bridge will be supported on abutments with lowered footings (depressed 2 feet ±) to allow for possible future lowering of the roadway.

Comment 1-13

"DEP notes that a number of its comments on the DEIR were not fully addressed in the right-of-way FEIR. Those comments must be addressed in the Operations/Stations FEIR (along with all remaining comments on the DEIR."

Response

See response to Comment Letter No. 4.

Comment 1-14

"In addition, DEP's comments concerning application of herbicides near public water supplies (as well as municipal water supplies) should be noted, and the plans or maps that they request should be included in the second FEIR."

Response

See response to Comment Letter No. 4.

Comment 1-15

"Information on alternatives, ridership, and revenue issues has been included in this FEIR in order to explain the project's background. That information also will be provided in the second FEIR, at which time it will be fully reviewed by this office."

Response

Please see Section 2.2 of this FEIR which analyzes the Worcester Commuter Rail Extension Project in terms of MBTA's overall financial capacity.

Comment Letter No. 2

Citizens Advisory Committee, Comments on FEIR (9/05/95)

Comment 2-1

"We therefore conclude that it is essential that the proponent analyze the worst-case vibration impacts (by assuming no intermediate stations and therefore higher speeds) before commencing construction of the track improvements. We recommend that the Secretary require the proponent to submit a supplemental FEIR, containing a worst-case vibration analysis and showing the required mitigation or demonstration of the lack of

need for mitigation, before being permitted to commence construction of the track improvements."

Response

The requested analysis is contained in Section 5.2 of FEIR #2, Millbury Station - Grafton Station - Railroad Operations.

Comment 2-2

"The CAC continues to believe that the potential impacts of vibration upon certain commercial properties (e.g., Fitzgerald's General Store and the Ipanema Restaurant in Southborough, and Burnam's Restaurant in Ashland) need to be analyzed."

Response

This issue, raised in the CAC comments dated July 27, 1995, on the first FEIR, was responded to in that FEIR.

Comment 2-3

"While the properties of particular concern to the CAC are indeed located near a *proposed* station site, it is by no means certain (as we have already noted) that the proposed stations will be constructed. The relevant experience, then, would be that of similar properties located near a right-of-way where trains travel at full speed. Is there any such relevant experience? Are patrons of a general store or restaurant not significantly bothered by the vibration of a train passing nearby at full speed?"

Response

Amtrak and Conrail trains pass by these properties at high speed now and will continue to do so. The economic viability of both restaurant and general store appears not to have been impacted severely.

Comment 2-4

"Recognizing that there may not be generally-accepted standards or guidelines for the analysis of vibration impacts upon commercial properties where the patrons might be disturbed by excessive vibration, the CAC recommends that the Secretary specify some project-specific standards for the analysis of such vibration impacts."

Response

The Secretary requested MBTA to address this concern, but did not set project specific standards for the analysis. Vibration impacts on commercial properties are addressed in Section 5.2, FEIR #2.

Comment 2-5

"The CAC therefore asks the question, will the proposed track improvements lead to an increase in operating speeds for any class of freight service? If so, the proponent should be required to analyze the impacts, including in particular the vibration impacts, of such increased freight speeds."

Response

The MBTA has determined for cost reasons that passenger train speeds will remain at 60 MPH. No further analysis due to speed increases will be required. Analyses have been revised to reflect the 60 mph speed.

Comment 2-6

"The CAC does not understand how it can be legal for work proposed as part of this project to commence prior to the Secretary's acceptance of the FEIR that covers that work."

Response

The MBTA, as detailed in the Railroad ROW FEIR Certificate, assured MEPA that the work then being conducted by Conrail was not part of this project.

Comment 2-7

"To provide for pedestrian access from the proposed Southborough station to the Hopkinton State Park, the Town of Hopkinton has expressed interest in a pedestrian overpass over Route 85, parallel to the tracks and part of, or adjacent to, the reconstructed bridge. The CAC strongly concurs with this suggestion, as such an overpass would fit well with other mitigation proposed or requested for the Southborough station site. We recommend that the proponent add such an overpass to the plans for reconstruction of the Route 85 bridge."

Response

Based on comments from the Town of Southborough, the MBTA is actively evaluating on underpass at the station. Due to the layout of ramps and stairs at the Route 85 bridge

necessary for the underpass, an overpass crosswalk would not be viable. Improvements to the Route 85 intersection, if undertaken as part of the station work, will include pedestrian crosswalks with traffic lights.

Comment 2-8

"The maps on pages 3-10 and 4-8 show several incorrect street names in Hopkinton. In particular, Cedar Street, River Street, and Cordaville Road are mislabeled; Lincoln Street should be labeled; and an unnamed street is incorrectly drawn. The maps on pages 3-9 and 4-7 show Fruit Street passing underneath Route 495 when in fact it passes *over* 495, and they omit Old Flanders Road entirely. All maps should be reviewed for accuracy."

Response

The above noted corrections have been made.

Comment 2-9

"The impacts upon pedestrian and vehicular traffic in Framingham, particularly at the intersection of Routes 126 and 135, should be addressed more thoroughly in the next FEIR in conjunction with the analysis of the impacts of operation of the proposed service."

Response

See Section 8.0 of FEIR, Millbury Station - Grafton Station - Railroad Operations.

Comment 2-10

"The CAC observes that with Interim Service significantly exceeding the projections reported in the DEIR, the ridership projections for full service, with or without intermediate stations, are in clear need of revision. While ridership projections are merely mentioned in passing in the current FEIR, the next FEIR ought to revisit the ridership projections in light of the experience obtained with the Interim Service."

Response

CTPS revisited its ridership projections, and they are discussed in Section 4.3 of the Millbury Station - Grafton Station - Railroad Operations FEIR. Generally, the new projections track quite well with the DEIR projections, once the inclusion of Framingham ridership is understood.

Comment Letter No. 3

Massachusetts Historical Commission/Brona Simon (9/06/95)

Comment 3-1

"Since summary results of the intensive survey were not now included in the FEIR, and the report of the investigation has not yet been received by the MHC, it is not possible at this time to determine what effect the second railroad track will have on significant historic and archeological resources, or to provide recommendations to avoid, minimize, or mitigate impacts to these resources."

Response

The information needed by MHC was not available at publication of the DEIR. The MBTA and MHC have had several subsequent meetings and discussions to address MHC concerns on historic and archaeological aspects of the project. The ongoing historic and archaeological work and the Memorandum of Agreement (contained in Appendix H) should address all concerns.

Comment 3-2

"Prudent and feasible alternatives to avoiding adverse impacts through project redesign should first be considered by project planners before committing to irrevocable loss of these resources."

Response

The project has gone through considerable redesign between the 60% submission level and the final contract documents in an effort to minimize the lateral extends of the track work. This was accomplished by substantial regrading and by inclusion of "ballast retaining walls" installed 10 feet off the centerline of tracks to define the outside limits of work in areas where design standards would otherwise extend the work towards these potential resources.

Comment 3-3

"I am particularly concerned with the proposal on page ES-12 that 'appropriate measures will be employed during construction to comply with MHC regulations.' Appropriate treatment of these resources should precede construction."

Response

The MBTA intends to comply with MHC requirements prior to construction. Appropriate measures during construction are necessary to address the unexpected discovery of resources.

Comment 3-4

"In regard to the historic and architectural resources within the proposed project area, MHC staff received the final submission of building and bridge inventory forms on June 5, 1995. Evaluation of this information by MHC staff has been hampered by the incomplete nature of the forms which do not meet the Secretary of the Interior's 'Standards and Guidelines for Archeology and Historic Preservation' (48 FR 44716-42) nor the standards and guidelines for the survey of historic properties as set forth in the MHC's Historic Properties Survey Manual."

Response

The MBTA has met with the MHC to address the completion of the forms in a manner acceptable to the commission.

Comment 3-5

"Aside from the consultation of assessors records, little original research was completed to provide sufficient historical context. Many of the historical narratives rely heavily on MHC reconnaissance survey reports for contextual information. In several instances, properties are incorrectly mapped or misidentified by address; a master map showing all inventoried properties identified by address is needed."

Response

The MBTA has met with the MHC to address the completion of the forms in a manner acceptable to the commission.

Comment 3-6

"No recommendations or criterion statements for National Register eligibility were included in this submittal."

Response

Revised submittals will include appropriate recommendations regarding National Register eligibility. Also refer to the Memorandum of Agreement in Appendix H.

Comment 3-7

"The inventory forms completed for the bridges lacked sufficient technical information regarding engineering significance, historic context, and condition. MHC staff recommend a meeting with the MBTA and the cultural resource consultants to discuss how to address the deficiencies of the cultural resource survey."

Response

The MBTA has met with the MHC to review and discuss these issues. An appropriate cultural resources survey is nearing completion.

Comment 3-8

"I continue to be concerned about the scheduling of the publication of the environmental review documents for this project, which have appeared in advance of planning information on historic and archaeological resources. I recommend that the portion of the project that is the subject of the FEIR not proceed until the impacts to important historic and archeological resources have been considered fully and treated appropriately."

Response

Due to the many variables of this major and complicated project, including separate filings of FEIRs, the sequencing of the work has been different from normal. Also see the Memorandum of Agreement in Appendix H.

Comment 3-9

"In reviewing the permit application for the intensive survey of the portion of the project that is the subject of the FEIR, MHC expressed concern that the scope of work for the survey did not include the proposed station sites (MHC 7/26/95, copy enclosed)."

Response

The permit application cited above covered the intended work for the Track and Layover FEIR. The intensive surveys for station sites will be covered under the appropriate future FEIR. For example, the permit application for the proposed Millbury and Grafton stations was submitted and approved in November 1995.

Comment 3-10

"I am also recommending, again, that the intensive (locational) archaeological survey for the complete project impact area (including the proposed stations) proceed as soon as possible, so that reviewers of subsequent FEIRs will have the benefit of this information."

Response

The intensive archaeological survey for Grafton Station was completed in 1995. The Millbury Station survey completion was delayed by winter weather. Survey for the remaining stations will be performed as soon as final locations are determined. Also see the Memorandum of Agreement in Appendix H.

Comment Letter No. 4

DEP Central Region/Mary J. Richards (8/31/95)

NOTE: A copy of DEP comments on the DEIR was attached to the FEIR Comment Letter. Responses to the DEIR Letter are in the DEIR Comment/Response Section.

Comment 4-1

"Not all of these issues have been adequately addressed in the first FEIR. The Department acknowledges that it was likely that more time was needed to adequately address these issues, however, the Department assumes that all unanswered issues (1-2; 6-15; 18-27) in this FEIR, including those relative to right-of-way activities, will be addressed in the second FEIR."

Response

Responses to the DEIR Letter are in the DEIR Comment/Response Section (See DEIR Letter #8.)

The responsibility for maintenance of the railroad right-of-way is, and will remain with Conrail, who owns the right-of-way. Vegetation Management Plan and Yearly Operation Plan are prepared and submitted by Conrail in compliance with regulatory requirements to compliment the responses herein; copies of the most recent VMP and YOP are included in the Millbury Station - Grafton Station - Railroad Operations FEIR as Appendix E.

Comment 4-2

"The Department is satisfied with the responses to comments that were provided to date. However, the Department wishes to emphasize one inconsistency in the body of the document that was also present in the DEIR. It is stated on page 4-56 that herbicides are not applied within 400 feet of any municipal water supply well, 50 feet of any private drinking water wells or within 100 feet of any surface drinking water supply. In contrast, the Rights of Way Regulations 333 CMR 11.04(2) (a) state that no herbicides shall be applied within 400 feet of any public ground water supply well. It is important to note that public ground water supply wells are not limited to municipal ground water supply wells as is implied in the FEIR. The Department's definition of a public water supply is a water supply which serves 25 people a day at least 60 days per year or which has 15 service connections; it is not dependent upon ownership. Therefore, public water supplies include municipal and privately owned public water supplies."

Response

The inconsistency in the DEIR referred to is so noted, as is the Department's definition of a public water supply. These items are correctly defined in Conrail's Vegetation Management Plan and Yearly Operational Plan included in Appendix E.

Comment 4-3

"Accordingly, herbicides shall not be applied within 400 feet of any public water supply well. All registered public water supply sources adjacent to the project must to be identified and labeled on the plans/maps in the second FEIR and addressed appropriately."

Response

Herbicides will not be applied within 400 feet of any public ground water supply well nor in any other areas identified in the VMP or the YOP, included in Appendix E.

Comment 4-4

"In addition, no herbicides shall be applied within the primary recharge area (delineated Zone II or one half mile radius) of a public ground water supply well except by selective application and not more than once every two years."

Response

Refer to response for Comment 4-3 and both the VMP and YOP included in Appendix E.

Comment Letter No. 5

MHD District No. 3/Peter J. Donohue, P.E. (9/07/95)

Comment 5-1

"As indicated in our review of the original draft EIR for this project, MHD permits may be required for access to several of the proposed intermediate stations depending on the final selection of the sites."

Response

The MBTA will apply for an access permit where necessary.

Comment 5-2

"Based on the function of this section of Route 85, improvements to the facility [Route 85 railroad bridge] should be designed to accommodate truck traffic. The recommended minimum underclearance for bridge structures located on this type of facility is 14'-6". It should be noted that efforts to eliminate truck traffic impacts to local streets in this area by constraining the underclearance on a roadway designated to carry such vehicles potentially results in an increase in similar types of impacts to other areas, possibly local, as vehicles divert around the constraint. The MHD strongly recommends reconsideration of this particular element of the railroad corridor improvements."

Response

See response to Comment 1-12.

Comment Letter No. 6

Southborough Board of Selectmen (9/07/95)

Comment 6-1

"The height clearance issue [Route 85 Railroad Bridge] has not clearly been resolved in the FEIR. In responses to CAC comments, July 27, 1995, it is stated that the bridge would remain a restricted structure, and the vertical clearances still would be less than 14'6". Any change in clearance must be one foot or less. Furthermore, comments will be coordinated during design phases."

Response

The clearance issues have been resolved. (See response to Comment 1-12.)

Comment 6-2

"It is stated that the roadway [Route 85] will remain accessible during construction. Traffic must be allowed to use this roadway, as no suitable detour exists."

Response

Traffic will be maintained on Route 85 during construction. No detour is proposed.

Comment 6-3

"All efforts must be made to coordinate construction activities, as they relate to the businesses, and residences in the general vicinity. In this regard, a method of reporting during construction should be set up, to coordinate and inform the public of activities."

Response

The MBTA will have as part of the design contract, a recommended maintenance of traffic plan. This plan will be coordinated with the Town prior to the completion of design.

Comment 6-4

"We reserve the right for continued right of comment during the design phases. While we recognize that the current structure [Route 85 Railroad Bridge] is not historically significant, replacement of the current granite supporting structure to concrete, does affect the historic nature of the neighborhood, and all efforts must be made to replicate the existing structures."

Response

The MBTA intends, within the context of the station, to make every effort to replicate the granite stone construction of the existing bridge. The Massachusetts Historical Commission will assist in the design review.

Comment 6-5

"While comment on the station design is not included in this report, it should be noted that one present concern of the design is the placement of a portion of the raised platform directly behind several residences at the westerly end of the station platform. The Town

would prefer the station platform be shifted east, so that the platform, and its lighting and other activities will not be directly behind the residences. This shift will extend the platform onto the bridge. Any construction being contemplated must take this into account, especially if the width of the bridge (14') must be enlarged to accommodate the platform extension."

Response

Due to structural issues, it is not cost effective to extend the platform over the bridge. However, the MBTA is actively evaluating an underpass for the station, which will minimize the platform impacts at the west end.

Comment 6-6

"Coordination of Wetlands Protection, coordination of the project with Town Officials, details of construction yard activities, and as mentioned above, continued discussion of design considerations continue to be priority concerns of the community."

Response

The MBTA has maintained coordination with the Town, and will continue to do so. The MBTA will file a Notice of Intent with the Conservation Commission under the Massachusetts Wetlands Protection Act for work at the proposed station site. The MBTA also intends to present design plans to Town Officials to solicit various review comments.

Comment Letter No. 7

Worcester Office of Planning and Community Development/Stephen F. O'Neil (8/31/95)

Comment 7-1

OPCD requested the MBTA to expand the current interim service schedule to include evening and weekend service from Boston to Worcester. *The MBTA did not offer a response to this request.* OPCD respectfully requests that the MBTA consider the expansion of interim service from Worcester to Boston to include reverse commuting, non-peak hour and weekend service."

Response

Basic Service will provide non-peak service to Worcester. The MBTA is currently preparing a weekend schedule which is proposed to be in operation early in 1997.

Comment Letter No. 8

Lydia M. Bogar (9/06/95)

Comment 8-1

"The MBTA has not adequately addressed noise and vibration issues. The CAC comments dated July 27, 1995 relative to Sections 4.1 and 4.3 must be responded to in more detail as soon as possible."

Response

Noise and vibration analyses have been revised to address concerns. See Section 5.2 of Millbury Station - Grafton Station - Railroad Operations FEIR.

Comment 8-2

"There is obviously track and signal work ongoing in the Grafton-Westborough area (and has been for at least two weeks). Although the work seems to be under the supervision and control of Conrail, it would be safe to presume that the work is being done at the request of the MBTA. I consider it outrageous that such work is proceeding during the EIR comment period. It would certainly make a reasonable person believe that any comments that they may make to your will not be heard by the MBTA, as they are proceeding on their schedule, not that of the towns and people impacted by their project."

Response

See Response to Comment 2-6.

Comment 8-3

"The MBTA and their liability carrier should read Section 6.0 of the CAC comments of July 27, 1995 concerning the parking area at the Interim Station. The lighting, walkways, general lot maintenance and broken parking meters at adjacent lots do not show the best

face of the MBTA or the City of Worcester. Someone is going to be hurt, and the aggravating factors for liability are measurable."

Response

The MBTA's Worcester Layover Facility Contract, currently under construction and adjacent to the Interim Station, includes certain improvements to the Interim Station including additional lighting, new pavement, walkways and a new stairway to Grafton Street (from Municipal Lot "A").

The Municipal lots along Grafton Street (under Route I-290 Viaduct), as well as the Interim Station, were constructed under the MBTA's Interim Station contract, but are currently operated and maintained by the City of Worcester.

Comment 8-4

"If there is to be a new proposal for a regional station at the Turnpike/I-495 Interchange, I ask that you void this Final EIR until such time as the CAC and interested parties can review and comment on the impact of such a regional station on the issues of noise and vibration, right of way drainage, fencing, mitigation measures and hazardous materials."

Response

The FEIR for Railroad Right-of-Way and Layover Facility was prepared because it can be logically separated from both local and regional station issues. The results of the Regional Station Study prepared by the MBTA are summarized in Section 3.3, Millbury Station - Grafton Station - Railroad Operations FEIR. Most recent information is that the Town of Westborough no longer considers a regional station as an alternative to local stations.

Comment Letter No. 9

Keith K. Davison (9/07/95)

Comment 9-1

"Contrary to the claim that this will 'largely complete' MBTA service area extension, a number of other additional projects loom, particularly New Bedford/Fall River.

Response

The point of this comment is not self-evident. The statement referred to in the Track and Layover FEIR was not intended to be a complete listing of all projects in the MBTA extension program. To the extend the commenter is concerned about overall MBTA financial capacity to undertake this project, please see Section 2.2, Millbury Station - Grafton Station - Railroad Operations FEIR.

Comment 9-2

"The imperative to implement this project 'unless infeasible' should not be allowed to derail the MEPA requirements of full public process consideration of impacts and alternatives."

Response

Section 4.4 of the DEIR addresses this issue. MEPA is, in part, about meeting regulatory standards. The language of 4.4 of the DEIR, in part, addresses the project in terms of DEP's regulatory standard at 310 CMR 7.36 concerning possible alternatives to it. Alternatives may be pursued if Worcester Rail proved "infeasible." Since it has not, no substitute project is warranted. The remaining language of 4.4, as well as language throughout the DEIR, thoughtfully explains why the MBTA believes this feeling is entitled to the Secretary's deference, since mass transit planning for metropolitan Boston is the MBTA's responsibility under law, while the Secretary's responsibility under law is to evaluate and see to the mitigation of a projects' environmental impacts. This deference should be all the greater in light of DEP's regulation, EPA's having added it to the State Implementation Plan, and the legislature's having generously funded it, as a result of those agencies' respective deliberative processes, all of which offered many opportunities for public participation.

Comment 9-3

Tables 2.1 do not carry through the most significant calculations in a uniform, integrated fashion comparing rail and bus. The choice of 'preferred alternative' is not supported by the figures presented."

Response

Rail and bus ridership has been estimated again for this FEIR. Some 15% of the total rail ridership is thought to be drawn from competing bus services. With 85% "new" riders, the preferred alternative remains the proposed commuter rail service.

Comment 9-4

"Subsequent changes in projected costs are so immense as to discredit the underlying methodology. Ridership projections are hypothetical exact numbers; an estimated range would be more honest."

Response

The Central Transportation Planning Staff (CTPS) estimates the projection accuracy of the Worcester Commuter Rail Extension ridership modeling to be on the order of ±20%. Even so, the mean between the high and low ends of this range are used in this FEIR for comparisons among alternatives so that a uniform base is employed.

Comment 9-5

"Financial Feasibility - This discussion does not adequately acknowledge the many other projects the MBTA is likely to, and should, undertake over the next 20 years. The MBTA deficit is large and growing. There is not a sound financial basis for the system, nor the prospect of one. Every dollar must be spent as effectively as possible, lest there be a 'revolt' drastically curtailing operations. This would have dire environmental impacts."

Response

Please see Section 2.2, Millbury Station - Grafton Station - Railroad Operations FEIR for a discussion of Worcester Rail in the context of the MBTA's overall financial capacity.

Comment 9-6

"Local stations should maximize non-car access, esp. in view of car start-pulse pollution characteristics."

Response

Stations will have sidewalks and bike racks, to encourage alternate modes of access. Other forms of station access will be encouraged.

Comment 9-7

"Accidents happen, and the injuries are regrettable. But in the vast majority of cases, great carelessness or intentional risk-taking is to blame. Ultimately, there is not a duty or even the possibility of protecting people from themselves. ROW fences are not appropriate in rural or semi-rural settings."

Response

Fencing will be utilized where safety issues indicate its need. Locations of proposed fencing areas along the corridor were reviewed for their impact on the surrounding environment.

Comment 9-8

"Horn usage should be locally determined in consultation with the affected community, not federally dictated."

Response

See Response to DEIR Comment 2-63.

Comment 9-9

"Layover Facility - No one wants to live next to throbbing train engines every night at 1 am! This would especially apply on hot summer nights; if abutters do not have air conditioning, the Project should assist. Since train parking locations are fixed, acoustic barriers would be cost effective."

Response

The FEIR for Railroad Right-of-Way and Layover Facility notes the provision for electrical power at the Layover for the express purpose of avoiding overnight train idling.

Comment 9-10

"Is there a commitment to park the noisiest train first and start it up last?"

Response

Train shutdown and startup will be determined by arrival and departure times and they consist of each train dictated by schedule and operational requirements.

Comment 9-11

"Why does the whole empty train have to be fully lit and air conditioned for a half hour while idling/parking? Why can't external power be used for this?"

Response

External power will be utilized until startup. However, the engineer will utilize the control cab end of the train to leave the layover, which requires the coaches to be powered up.

Comment 9-12

"No commitment to minimize the various sources of noise at layover facility."

Response

The MBTA committed to installation of electric power to avoid overnight idling of trains, and to installation of air compressor to reduce early morning start-up operations. Both measures are noise mitigation.

Comment 9-13

"The vegetation management Yearly Operational Plans are inadequate. A sincere effort must be made to generate management plans that do not require regular broadcast application of herbicides."

Response

The Yearly Operational Plans (YOP) prepared and submitted by Conrail (the rail line owner) and approved by Massachusetts Department of Food and Agriculture are the required documentation as prescribed by the governing current regulations.

Comment 9-14

"All comments on this FEIR should be published in the next one, even if no responses are included."

Response

All Comment Letters on the November 1994 DEIR and on the July 1995 FEIR are included in this Appendix - Volume 1.